

In the Matter of: )  
 )  
RETAIL ACCESS OPTIMIZATION ) Docket No. N2011-1  
INITIATIVE, 2011 )

DESIGNATIONS INCORPORATED INTO THE RECORD  
PURSUANT TO P.O. RULINGS 22 AND 24

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BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative,  
2011

Docket No. N2011-1

DESIGNATION OF WRITTEN CROSS-EXAMINATION

Party

Interrogatories

**National Association of Postmasters of the United States**

**Curt Artery (NAPUS-T-2)**

Postal Regulatory Commission

USPS/NAPUS-T2-1 - 11

**Rita Zilinski (NAPUS-T-1)**

Postal Regulatory Commission

USPS/NAPUS-T1-1 - 17

**Public Representative**

**John P. Klingenberg (PR-T-2)**

Postal Regulatory Commission

USPS/PR-T2-6

**United States Postal Service**

**Institutional**

American Postal Workers Union,  
AFL-CIO

DBP/USPS-63, 77

PR/USPS-22 - 23

National League of Postmasters

DBP/USPS-82

Postal Regulatory Commission

DBP/USPS-63, 77, 82  
NLP/USPS-16  
PR/USPS-22 - 23  
POIR No.5,question1  
POIR No.6,question1


Party

Interrogatories

Responses to questions posed by the Commission during cross-examination on October 28, 2011, questions 1-6

Notice of additional material provided by the National League of Postmasters Per the Request of the Commission During the Hearings Held on October 17 and 18, 2011, filed October 21, 2011.

Respectfully submitted,



Soshana M. Grove  
Secretary

INTERROGATORY RESPONSES  
DESIGNATED AS WRITTEN CROSS-EXAMINATION

Interrogatory

Designating Parties

**National Association of Postmasters of the United States**

**Curt Artery (NAPUS-T-2)**

USPS/NAPUS-T2-1	PRC
USPS/NAPUS-T2-2	PRC
USPS/NAPUS-T2-3	PRC
USPS/NAPUS-T2-4	PRC
USPS/NAPUS-T2-5	PRC
USPS/NAPUS-T2-6	PRC
USPS/NAPUS-T2-7	PRC
USPS/NAPUS-T2-8	PRC
USPS/NAPUS-T2-9	PRC
USPS/NAPUS-T2-10	PRC
USPS/NAPUS-T2-11	PRC

**Rita Zilinski (NAPUS-T-1)**

USPS/NAPUS-T1-1	PRC
USPS/NAPUS-T1-2	PRC
USPS/NAPUS-T1-3	PRC
USPS/NAPUS-T1-4	PRC
USPS/NAPUS-T1-5	PRC
USPS/NAPUS-T1-6	PRC
USPS/NAPUS-T1-7	PRC
USPS/NAPUS-T1-8	PRC
USPS/NAPUS-T1-9	PRC
USPS/NAPUS-T1-10	PRC
USPS/NAPUS-T1-11	PRC
USPS/NAPUS-T1-12	PRC
USPS/NAPUS-T1-13	PRC
USPS/NAPUS-T1-14	PRC
USPS/NAPUS-T1-15	PRC
USPS/NAPUS-T1-16	PRC
USPS/NAPUS-T1-17	PRC

InterrogatoryDesignating Parties**Public Representative****John P. Klingenberg (PR-T-2)**

USPS/PR-T2-6

PRC

**United States Postal Service****Institutional**

DBP/USPS-63

DBP/USPS-77

DBP/USPS-82

NLP/USPS-16

PR/USPS-22

PR/USPS-23

APWU, PRC

APWU, PRC

NLP, PRC

PRC

APWU, PRC

APWU, PRC

POIR No.5,question1

POIR No.6,question1

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**N2011-1**

**National Association of Postmasters of the United States**

**Curt Artery  
(NAPUS-T-2)**

**USPS/NAPUS-T-2-1.** Your testimony refers to "the use of the small office variance (SOV) tool as the basis for identifying [P]ost [O]ffices for closure..." To the extent that you contend the Postal Service uses SOV as the basis for a decision to discontinue a particular Post Office, please provide the basis for this contention. Please provide any documents you relied upon in support of the portion of your testimony quoted above.

Answer. When informed that a large number of offices would be subject to the discontinuance study, NAPUS asked what the criteria would be. NAPUS members were informed by the postal districts and areas that the criteria capture those offices that did have walk in revenue of \$27,500.00 and earned work load of less than two hours. In addition, Postal Service witness Boldt referenced these criteria in USPS-T-1. The figures for earned work load come from the SOV report.

**USPS/NAPUS-T-2-2.** Before drafting your testimony, did you ever use SOV? What is the date of your most recent use of SOV that occurred before you drafted your testimony? Please also explain in general terms when you have used SOV and for what purposes.

Answer. Yes I did use the SOV program. The most recent dates I used the SOV program were Sept. 9, 12 and 13, 2011.

I use the SOV for individual Postmasters and officers-in-charge (OIC) of post offices to explain to them how to access the program. As part of my presentation, I instruct them on how to identify the data and ensure it is accurate, with respect to the work load and value for the delivery administrative earned workhours. I also help to explain other areas of interest within the SOV program.



**USPS/NAPUS-T-2-3.** Your testimony states that "[o]ne of the concerns I have with regard to the SOV is that the system is not periodically updated to integrate new data, and, therefore, is not current or accurate." What is the basis for this statement? Please provide any documents you relied upon in support of the portion of your testimony quoted above. How often do you understand that it is updated, and how does that compare to what you think is most appropriate?

Answer. In SOV, on the Delivery Earned Administrative Workload Earned, I noticed there were zeros under the "Value Column," where there should have been a figure. Also, when I talked to Postmasters, OICs and supervisors, they did not know what information was missing, or why it was missing. Moreover, they stated they were never instructed to update the data, or how to update the information.

The document on which I relied was the actual information I found in the SOV program for different offices. I am including an example of this type of inaccurate SOV reporting on the two pages that follow this response.

In my experience, updating the data is only upon request by the postal district and the Postmaster of the inquiring office. I think a better way of maintaining timely data is updating it quarterly; this would make it consistent with other documentation that is required for other postal reports. Also, at the bottom of the "Delivery Administrative Earned Workload" report, there is an asterisk that states "District Level Editable Workload Elements." This means that the districts have the ability to change these values. I can not find where Headquarters have ever changed a value or updated the program.

## ROSEBUD PO - 297236 DELIVERY ADMIN EARNED WORKHOURS

WORKLOAD ELEMENT	SOURCE	VALUE	SOV FACTORS INCLUDES STB	BENCHMARK MINS / DAY
2ND NOTICES DLVS	DELIVERIES	151	1.9305 minutes per 1000 Deliveries	0.29
APC MAINTENANCE	# PER MACHINE	0	4.6281 per machine	0.00
AVG MAILINGS PER	# PER	1.00	Mailings * 12 Mth * 27.6850 min / 302	1.10
BOX ACCOUNTABLE MAIL	ROUTES 1 per 500	0.14	5.7933 minutes per route	0.81
CALLER SERVICE (PAID)	AVG DAY	0	Callers * 1.2124 minutes	0.00
CANCEL MAIL	ACTUAL MINUTES	0	Actual * (STB Factor 0.0729)	0.00
CARRIER ACCOUNTABLES	ROUTES	1	5.7933 minutes per route	5.79
CFS MAINTENANCE	DELIVERIES	151	0.5293 minutes per 600 Deliveries	0.17
COLLECTIONS	ACTUAL	10	Actual * (STB Factor 0.0729)	10.73
DISPATCH DLVS	DELIVERIES	151	5.7933 minutes per 1000 possible	0.87
EXPRESS MAIL DELIVERY	ACTUAL	0	Actual * (STB Factor 0.0729)	0.00
EXPRESS/PRIORITY SCANS	# OF SCANS	25	0.1332 min for each of the 1st 200 + 0.1332 min each > 200	3.38
FIRM HOLDOUT	AVG DAY	0	Firm Holdouts * 1.2000 minutes	0.00
FLEX TIME	APPROV MIN.	0.00	Actual Authorized Overtime	0.00
NIXIE/UBM	DELIVERIES	151	4.6281 minutes per 500 Deliveries	1.46
OFFSITE TRAVEL/ADMIN	ACTUAL MINUTES	0.00	Actual * (STB Factor 0.0729)	0.00
PN &CLS SUPPLIES &SVCS	# OF OFFICES	1	12.07 minutes per office	12.07
P.O. BOX MAINT	BOXES-RENTED	69	Rented boxes * 1.9305 min / 302	0.44
POST OFFICE BOXES	RENTED	69	Not Applicable	
PREMIUM FORWARDING SVC	ACTUAL	0	Actual * (STB Factor 0.0729)	0.00
ROUTES CDS	DELIVERIES	82	Not Applicable	
ROUTES CITY	DELIVERIES	0	Not Applicable	
ROUTES RURAL	DELIVERIES	0	Not Applicable	
TELEPHONE	DELIVERIES	151	2.8966 minutes per 1000 Deliveries	0.44
VALIDATE 1412 'S	POS	0	5.7933 minutes per 1412	0.50
VERIFY DEPOSIT/TRANSMIT	# OF OFFICES	1	33.1650 minutes per Office	33.17
Period 10/03/2009 - 08/28/2011 (575 Data Days)		TOT. BENCHMARK MINUTES P/DAY		71.22
Report date 09/02/2011		TOT. ADMIN BENCHMARK HOURS		682.52
Bold Lettering = District Level Editable Workload Elements				

GLENN ROCK PD - 573876 DELIVERY ADMIN EARNED WORKHOURS			
WORKLOAD ELEMENT	SOURCE	VALUE	SOV FACTORS
END NOTICES DLVS	DELIVERIES	1848	18000 minutes per 1000 DLVS
APC MAINTENANCE	# PER MACHINE	0	4500 per machine
Avg MAILINGS PER	# PER	0.00	Mailings = 27,500 MW / 1000
BOX ACCOUNTABLE MAIL	ROUTES 1 per 500	3.18	97000 credits per route
CALLER SERVICE (PAID)	AVG DAY	0	Credits = 1,210 minutes
CANCEL MAIL	ACTUAL MINUTES	0	Actual = 1518 Factor 0.0000
CARRIER ACCOUNTABLES	ROUTES	2	0.700 minutes per route
CPS MAINTENANCE	DELIVERIES	1948	0.6700 minutes per 100 DLVS
COLLECTIONS	ACTUAL	0	Actual = 1518 Factor 0.0000
DISPATCH DLVS	DELIVERIES	1848	0.700 minutes per 1000 DLVS
EXPRESS MAIL DELIVERY	ACTUAL	0	Actual = 1518 Factor 0.0000
EXPRESS/PRIORITY SCANS	# OF SCANS	75	0.1000 per 1000 scans
PRM HOLDOUT	AVG DAY	0	From 10/1/00 to 12/31/00
FLEX TIME	APPROV MIN	0.00	Approved minutes per 1000
INTERVIEW	DELIVERIES	1848	0.700 minutes per 1000 DLVS
OFFSITE TRAVEL ADMIN	ACTUAL MINUTES	0.00	Actual = 1518 Factor 0.0000
ON EOL SUPPLIES ASVCS	# OF OFFICES	1	10.00 minutes per office
P.O. BOX MAINT	BOXES-RENTED	1592	Rentals per box = 1,000 MW / 200
POST OFFICE BOXES	RENTED	1592	Min Approved
PREMIUM FORWARDING SVC	ACTUAL	0	Actual = 1518 Factor 0.0000
ROUTES COS	DELIVERIES	354	Not Approved
ROUTES CITY	DELIVERIES	0	Not Approved
ROUTES RURAL	DELIVERIES	0	Not Approved
TELEPHONE	DELIVERIES	1848	0.700 minutes per 1000 DLVS
VALUATE 14 12'S	POS	2	5.700 minutes per 1412
VERIFY DEPOSIT/TRANSMIT	# OF OFFICES	1	30.150 minutes per Office
Report date 09/20/2011			
Report 09/20/2011 - 09/20/2011 (202 Main Days)			
TOTAL BENCHMARK MINUTES PER DAY		TOTAL BENCHMARK HOURS	
		159.87	
		759.36	

UNITED STATES POSTAL SERVICE

**USPS/NAPUS-T-2-4.** Your testimony states that "new scanning technology is not being input into the SOV program." What is the basis for this statement? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

Answer. The USPS has added new scanning technology for use with new products and services. Such technology includes new scanning equipment. However, this technology is not being used to upgrade data in the SOV program. The technology I am referring to is used in other postal reports and programs. One may update actual figures with accurate data instead of using the SOV one-size-fits-all approach.

**USPS/NAPUS-T-2-5.** Your testimony states that “[a]lthough new Postal Service programs have the capability to account for current [P]ost [O]ffice activity – both financial and non-financial – the SOV does not.” Please identify the activity included in the term “non-financial” as used in the passage quoted above. What is the basis for the statement in the passage quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

**Answer.** Non-financial activities that are not included or are inaccurate in the SOV program, and not found in the walk in revenue portions of the SOV program or the earned work hours include: delivery of parcel post, delivery of “accountable” mail, bulk mailing, and required multiple scanning of most USPS parcel services. Also, SOV does not include nonrevenue questions asked by customers about postal products and services. Unfortunately, SOV offices have no basis for documenting such nonfinancial transactions; consequently, there no procedure that I would be able to document.

**USPS/NAPUS-T-2-6.** Your testimony refers to "deficiencies includ[ing] scanning Express Mail, Priority, parcel, parcel select, parcel return, parcel tracking, cancelling, and premium forwarding." Please explain the alleged deficiencies you identify in the passage quoted above. How do you believe that the deficiencies can or should be remedied?

Answer. In the SOV program, EAS Level 53 thru EAS Level 18 offices are given a prescribed amount of scans, depending on the level of the office. When SOV was established, an office was mandated to scan only once. Now, each postal product and service is mandated to receive at least three scans. Also, since the inception of the SOV program, the USPS has introduced new products and services. There is not "allowable time" provided in the program for these new products and services. Some of these deficiencies can be mitigated through updating the information quarterly from actual data, not one-size-fits-all.

**USPS/NAPUS-T-2-7.** Your testimony states that "[t]he Postal Service fails to use these tools to measure actual workload." Please identify what is included in the phrase "these tools" as used in the passage quoted above. What is the basis for the statement quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

Answer. The tools at the disposal of the USPS include web-based programs that are updated and based on actual data. These reports can be found in the POS system, e-moves, and Enterprise Data Warehouse (EDW). The POS program has actual times assigned to different products and services that are used to calculate the workload. These times could be used in SOV offices. In addition, function 4 audits could be used to determine the number of products used and sold.

**USPS/NAPUS-T-2-8.** Your testimony states that SOV also does not capture workload needed to validate 'Financial Form 1412,' with regard to Sarbanes-Oxley Act (SOX) compliance. Under SOX, non-automated offices are required to provide handwritten documentation and verification of day-to-day transactions. This data is shown on PS Form 1412. This document is submitted daily to a web-based program, referred to as 'e-moves.' The amount of time given under SOV does not reflect the actual time needed to perform this task. What is the basis for these quoted statements? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

**Answer.** In the SOV program, under Delivery Administrative Earned Workhours, the time provided for the workload element value is not adequate for the Postmaster to validate Form 1412. The reason for this assessment is that the Postmaster is required to: complete a 1412 and validate all the inserted numbers in the form, with the proper supporting documents; recover and print the required webbats reports; sign and verify the documents; and, finally, file the documents. There are no shortcuts for this process, since this is a SOX compliance issue. I can verify this procedure because I have conducted SOX audits for the Colorado/Wyoming District and Western Area.



**USPS/NAPUS-T-2-9.** Your testimony states that “[i]n sum, [P]ost [O]ffices are not receiving credit for required functions. These include web-based programs, 1412 validation, cancelling mail, scanning, function 4 audits, and caller service.” What is the basis for the statements quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

Answer. These are all functions that are required to have proper documentation to demonstrate that they have been completed timely and correctly, and that the data is verified. These functions are performed irrespective of the office level and must be given adequate time to be completed.

**USPS/NAPUS-T-2-10.** Your testimony states that "...SOV time standards are inconsistent with [P]ost [O]ffices operating within a point-of-service (POS) terminal environment." What is the basis for this statement? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

Answer. In a POS environment each function, service, and window transaction is given a determined amount of time credit. Specifically, the window credit translates into minutes and seconds; then, credit for retail services is calculated. In contrast, this is not the method used to compile data in a SOV environment. I am providing an example of the documentation provided in a POS office. No such document is used in SOV office.

# DM WOS AIC Look-Up Report

Examples of how to convert Time Factors into minutes and seconds:

\* 4.77 = 4 minutes + .77 \* 60 seconds = 4 minutes, 46 seconds

\* 1.19 = 1 minute + .19 \* 60 seconds = 1 minute, 11 seconds

Worked Now Groups	AIC	Description	Previous Time Factor	Current Time Factor
Non-Revenue	0000	COD Pickup	5.17	5.08
		Express Mail Pickup	1.19	1.19
	+	Hold Mail	1.19	1.19
	+	Non-revenue Pickup	1.33	1.30
	+	Other Mail Pickup	1.19	1.19
	+	PO Overflow	1.19	1.19
	+	Un-num Parcels	1.19	1.19
Trust	0053	Business Reply Mail/Postage Due Adv Deposits	1.82	1.73
	0054	Customs Collections	2.00	2.00
	0055	Express Mail Advance Deposits	1.48	1.45
	0057	Employee Stamp Credit Overage	2.80	2.80
	0070	Customer Permit Account Advance Deposit	1.37	1.32
	0074	Spec Provisions Locally Managed Trust Adv Dep	1.57	1.60
	0007	Forever Stamp Sales - Window Services	0.53	0.55
Postage	0083	Local Commemorative Envelopes Sales	0.63	0.57
	0084	Breast Cancer Stamp Sales	0.58	0.57
	0085	Discontinued	0.58	0.58
	0086	Precancelled Stamp Sales	0.52	0.50
	0087	Reserved	0.58	0.58
	0088	Discontinued	0.58	0.58
	0089	Discontinued	0.58	0.58
	0090	Postage Stock Sales	0.57	0.57
	0091	Bird Stamp Sales	0.52	0.52
	0092	Philatelic Product Sales	0.33	0.38
	0100	Domestic Money Order - Value	1.07	1.05
	0101	Domestic Money Order - Fee	0.00	0.00
Retail Services	0102	International Money Order - Value	2.48	2.40
	0103	International Money Order - Fee	0.00	0.00
	0105	Sure Money Sales - Funds (Restricted Entry)	0.68	0.87
	0106	Sure Money Sales - Fee (Restricted Entry)	1.72	1.73
	0108	Premium Forwarding Service Application Fees	3.02	3.68
	0110	Post Office Postage Meters Sales	0.53	0.58
	0111	Discontinued	5.06	5.06
	0112	Discontinued	2.80	2.80
	0113	Additional Postage Revenue	0.72	0.68
	0114	Postage Due Invoices	0.52	0.52
	0115	12-Month PO Box Fees	2.13	2.08
	0116	IRM, Qualified, and Wc. Avg. Annual Acct Fee	1.77	1.73
	0117	First-Class Presort Annual Mailing Fee	2.07	2.07
	0118	Media and Library Mail Presort Mail Fees	2.35	1.82
	0120	Correction of Mailing Lists	1.28	1.10
	0121	Permit Imprint First-Class Mail Postage	1.33	1.33
	0122	Permit Periodicals Denied	1.73	1.62
	0123	Lobby Services Revenue	1.03	1.07
	0124	Permit Imprint-Media Mail and Library Mail	1.22	1.27
	0125	Permit Imprint-Standard Mail-Nonprofit	1.05	1.03
	0126	Miscellaneous Non-Postal Revenue	1.10	1.07
	0127	Privacy Act Copying Fees	1.18	1.18
	0129	Change of Address Information Fees	0.17	0.23

**USPS/NAPUS-T-2-11.** Your testimony states "POS offices can track actual time used in completing retail transactions. SOV offices do not have this capability, so they are mandated to follow a one-size-fits-all benchmark." What is the basis for the statements in the passage quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above. What, if any, differences can you identify between those offices for which SOV is used and POS offices?

Answer. In a POS office, each time a transaction is performed, the POS software inserts the transaction in the proper account identifier code (AIC), and provides the allowed time. At the end of the day, POS software gives the total of all transactions performed for that day and gives credit for each time a postal product is scanned. In contrast, SOV provides for an average of only one scan per product. The impact of the distinction between a POS office and an SOV office is the ability to accurately evaluate postal workhours in identifying post offices for discontinuance review under the RAOI. In summary, the differences are attributable to POS offices being credited with actual time and credit, which are updated daily. SOV offices are given a one-size-fits-all methodology, and are updated only sporadically. In essence, SOV offices rely on gross estimates for workhours. For documentation, please refer to question T-2-10.

**N2011-1**

**National Association of Postmasters of the United States**

**Rita Zilinski  
(NAPUS-T-1)**

**USPS/NAPUS-T1-1.** Your testimony states that you were “always extremely concerned about the security and safety of our mail.” Your testimony also states that “the Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas.” To the extent that you contend that Neighborhood Delivery Collection Box Units (NDCBUs) and unlocked curbside mailboxes are not safe, please provide the basis for this contention in the areas outside of the communities where you served in an employment capacity with the Postal Service. Please provide any documents you relied upon in support of this general assertion.

Answer. I am providing my real-life work experience; as such, my familiarity is limited to my own state, so I am unable to speak with authority about other communities. The Postal Service may wish to communicate with managers-in-charge and local officials of other small towns and rural communities relating their concerns about mail security.

**USPS/NAPUS-T1-2.** Your testimony states that you were "always extremely concerned about the security and safety of our mail." Your testimony also states that "the Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas." Do you know or have personal knowledge of the percentage of rural customers who are serviced through the following:

- (a) curbside boxes,
- (b) NDCBUs,
- (c) other centralized delivery or
- (d) some other type of delivery?

Answer. No.

**USPS/NAPUS-T1-3.** Your testimony states that "In weather impacted areas, ... , NDCBU boxes easily freeze in the winter, making it virtually impossible to open." Your testimony also states that "carriers often inadvertently damage the boxes when using hammers to loosen the ice from around the doors so they can deliver the mail." Please provide any documents you relied upon in support of the portion of your testimony quoted above for all of the areas outside of the communities you served in an employment capacity with the Postal Service.

Answer. I do not have in my possession such documents. I can only relate statements made to me, as Postmaster, from carriers who have used a hammer to break the ice from the mailboxes.



**USPS/NAPUS-T1-4.** Please describe the following:

- (a) the research you conducted on NDCBUs before finalizing your written testimony, and
- (b) your understanding of NDCBUs and what their current use is by the Postal Service.

Answer.

(a) I have not conducted research on NDCBUs. I am only testifying as to my personal experience as a Postmaster.

(b) I can only provide insight regarding the NDCBUs that were used by postal customers in the areas that I served.

**USPS/NAPUS-T1-5.** Please describe your understanding of the "Rev E" Cluster Box Unit and identify or describe its current use is by the Postal Service.

Answer. I do not have an understanding of the Rev E Cluster Box Unit use and their deployment. I understand that approved collection box units (CBUs) are being used in new developments and as replacements for NDCBUs. However, as Postmaster, I do not believe that there is a major distinction, other than the acronym, between NDCBUs and CBUs. Each one of the postal structures share the dominant characteristic of being a freestanding, joined group of mailboxes located in the public domain or in a common outdoor area.

**USPS/NAPUS-T1-6.** Please describe your understanding of the "Rev F" Cluster Box Unit and identify or describe its current use is by the Postal Service.

Answer. Same answer as T1-5.

**USPS/NAPUS-T1-7.** Your testimony states that "Closing a post office forces postal customers to receive their mail through ... a neighborhood delivery collection box unit."

- (a) Please confirm whether NDCBUs serve as authorized mail receptacles for new delivery or as replacement pieces.
- (b) If part (a) is not confirmed, when were NDCBUs discontinued for new delivery or replacement pieces?
- (c) Do you know the difference between a "Rev F" Cluster Box Unit and NDCBUs?
- (d) If the answer to part (c) is affirmative, please describe all differences of which you are aware between the "Rev F" Cluster Box Unit and NDCBUs.
- (e) Do you know whether any outdoor centralized delivery that would be implemented as a result of the RAO Initiative would not be a NDCBU, but a "Rev F" Cluster Box Unit?

Answer.

- (a) Please refer to T1-5.
- (b) I do not know that date.
- (c) No
- (d) The answer to (c) was no.
- (e) No.

**USPS/NAPUS-T1-8.** Your testimony states that "[i]n weather impacted areas, ..., NDCBU boxes easily freeze in the winter, making it virtually impossible to open."

(a) Please provide any documents you relied upon which would support this claim.

(b) To the extent that you contend that there is the existence of systemic freezing lock issues associated with the "Standard" or "Modified" Arrow lock, please provide the basis for this contention in the areas outside of the communities where you served in an employment capacity with the Postal Service. Please provide any documents you relied upon in support of this general assertion.

Answer.

(a) I have relied on the reports from my carriers.

(b) I can only provide information about the communities that I served as Postmaster.

**USPS/NAPUS-T1-9.** Does your testimony account for the fact that if a Village Post Office is established in a community with the availability of interior space, the Postal Service would not use a "Rev F" Cluster Box Unit in an exterior location, but a Rotary Cabinet or USPS-Std-4C?

Answer. If a location for a "Village Post Office" were to be available, yes.

**USPS/NAPUS-T1-10.** Based on your training as a security control officer, as described in your testimony, please explain the design and performance differences between the "Rev E" Cluster Box Units, Neighborhood Delivery Collection Box Units and "Rev F" Cluster Box Units? Please provide any documents you relied upon in support of this explanation.

Answer. I cannot explain the design and performance differences between the referenced mail receptacles. Please refer to T1-5.

**USPS/NAPUS-T1-11.** Your testimony also states that "carriers often inadvertently damage the boxes when using hammers to loosen the ice from around the doors so they can deliver the mail."

(a) What is the extent of damage you would permit as a postmaster to Postal Service property before filing an accident report? Please provide documents in support of your response.

(b) What training do you have in strength of materials?

Answer.

(a) I have always filed a report, if any damage was done to postal property. The chipping of ices on locks and curbside boxes was not on postal property.

(b) None.



**USPS/NAPUS-T1-12.** Your testimony states that you were “always extremely concerned about the security and safety of our mail.” Your testimony also states that “the Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas.”

(a) Please provide any documents you relied upon in support of your assertions.

(b) Before finalizing your written testimony, did you review the Postal Service’s institutional response to PR/USPS-17?

(c) During your Postal career, what, if any, initiatives/actions did you propose to specifically address issues surrounding NDCBU/Cluster Box Unit security and what were the results in the communities where you served? Please provide documents in support of your response.

(d) How many reports (by year) did you make of vandalism/theft of NDCBUs, Mailboxes, etc. in your postal career? When and to whom were these reports transmitted? Please provide copies of any such reports.

(e) How many reports (by year) did you make of inoperability of NDCBUs, Mailboxes, etc. in your postal career? When and to whom were these reports transmitted? Please provide copies of any such reports.

(f) Describe your familiarity with data and statistics on the number of Volume Mail Attacks (VMA) to High Security Cluster Box Units, Cluster Box Units, and NDCBUs over the past three fiscal years.

Answer.

(a) I do not have any documents. I am providing the insight of someone that has served a rural community.

(b) No.

(c) I have suggested that the owners of the boxes construct a roof, a back and two sides around the boxes. I do not have documentation.

(d) None

(e) I do not recall how many times I filed reports, but when they were filed they were submitted to Eastern Area Facilities for repairs.

(f) I do not have familiarity with the data and statistics referenced.

**USPS/NAPUS-T1-13.** Your testimony states that in communities you served, "mailboxes were destroyed and mail was scattered throughout the roadway."

(a) Did you consult any law enforcement statistics or records before making this assertion? If so, please provide those records that you reviewed.

(b) Do you know how many complaints are recorded in the financial crimes database for NDCBUs in West Virginia for any given recent fiscal year?

(c) What actions, if any, did you take as a postmaster to address these incidents as they occurred? Did you file any reports of mailboxes being destroyed? When and to whom were these reports transmitted? Please provide copies of any such reports.

(a) No

(b) No.

(c) I do not have in possession the requested documents. The reports were filed with the sheriff's department and the West Virginia State Police. The reports should be at the post offices and with the referenced law enforcement officials.

**USPS/NAPUS-T1-14.** Your testimony states that "most of the time, nothing is done when vandalizing is reported, except the filing of a report."

(a) Did you ever decide not to report incidents of vandalism? If so, how many times did you do so? Please explain the circumstances of each such occurrence.

(b) Did you consult any law enforcement statistics or records before making this assertion? If so, please provide those records that you reviewed.

Answer.

(a) No.

(b) No.

**USPS/NAPUS-T1-15.** Your testimony states that "This past year, mail was removed from a mailbox; a customer had placed five pieces of out going mail in the box. The thieves defaced the checks and cashed them at two businesses. When this occurred, it was the customer's responsibility to contact the sheriff's department and report the damage. A person was arrested for the crime, although most of the time, nothing is done when vandalizing is reported, except the filing of a report."

- (a) Do you have personal knowledge of this incident?
- (b) Were you notified of this incident shortly after it occurred?
- (c) What is the relationship of the victim to you?
- (d) Did you make any recommendations to the victim as to where to report the incident? If so, what did you recommend?
- (e) Did you file any reports to law enforcement regarding this incident?
- (f) Please identify the facts, dates, and circumstances for each instance when you reported vandalism in the communities where you served and nothing was done outside the filing of a report?

Answer.

- (a) Yes.
- (b) Yes.
- (c) The victim was a customer of a neighboring post office, Cool Ridge, where I was working. The customer came to the post office with the paperwork for the postal inspectors. A resident of the town of Ghent went to prison for the crime.
- (d) No.
- (e) No.
- (f) I cannot recall the dates of all the reports. Records should be available at the local post offices. I reported the incidents to the local sheriff's department regarding numerous boxes that were beaten with a baseball bat. A few days later, I reported the names of the boys and the school the boys attended. Also, I remember that, in 2010, I reported to the Postmaster that a person was going through the cluster of curbside mailboxes. The state police were contacted.

**USPS/NAPUS-T1-16.** Your testimony states "customers move there [sic] mail from highway contract mail boxes to a Post Office Box because their box had been destroyed and mail continually damaged." Did you consult any USPS delivery statistics or records before making this assertion? If so, please provide those records that you reviewed.

Answer. No.

**USPS/NAPUS-T1-17.**

(a) Before finalizing your testimony, did you review the Office of Inspector General Audit Report - Modes of Delivery, Report Number DR-AR-11-006?

(b) If the answer to part (a) is affirmative, please confirm that that report concludes that centralized delivery is more cost effective and efficient than door-to-door or curbside delivery because carriers deliver mail to a group or cluster of mail receptacles at one delivery point.

Answer. No.

**N2011-1**

**Public Representative**

**John P. Klingenberg  
(PR-T-2)**

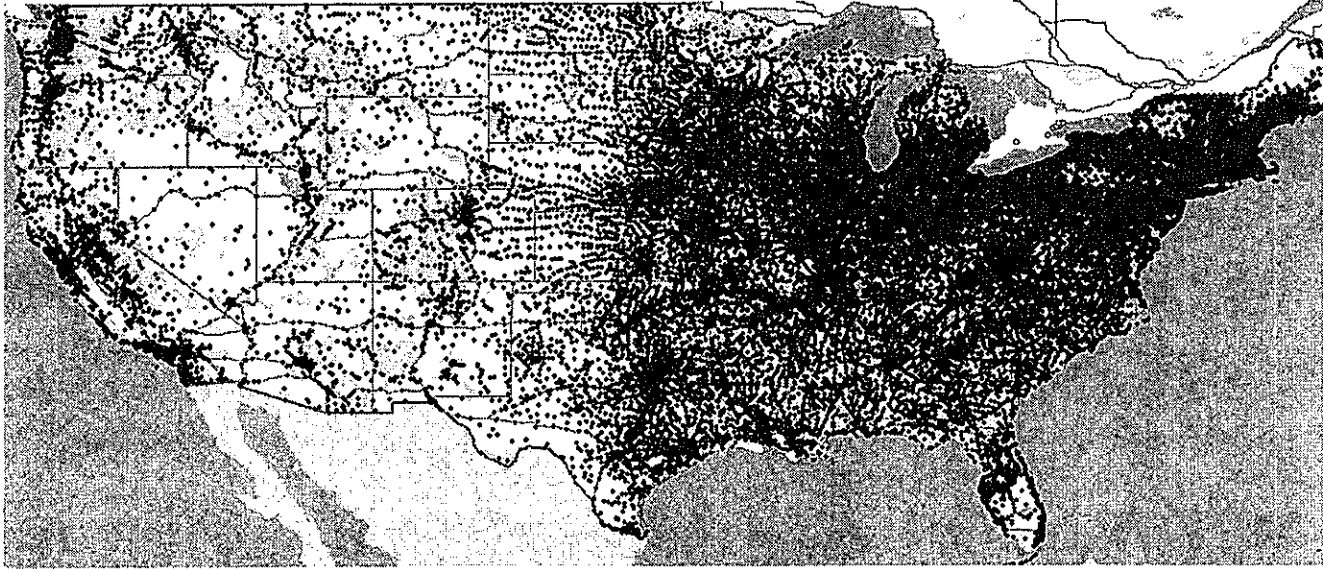
**RESPONSE OF PUBLIC REPRESENTATIVE WITNESS KLINGENBERG  
TO INTERROGATORY OF THE UNITED STATES POSTAL SERVICE**

**USPS/PR-T2-6.** Graphic 1, a map of the United States with all Postal Service offices, is overtly misleading because the RAOI offices are dark solid red with black outline and the open offices are very light blue with blue outline; one consequence is that the reds are always on top of the blues. Please produce a new variant of Graphic 1 that uses, and shows in its legend, three colors for the two underlying data types plus the intersection.

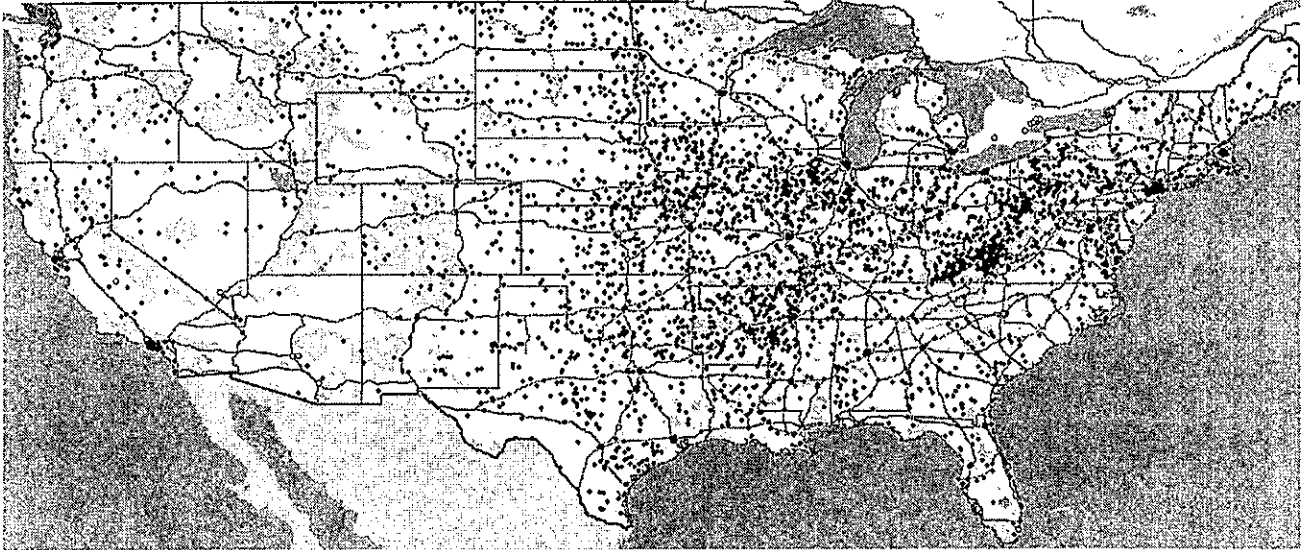


**Response.**

Post Offices Not on RAOI List



Post Offices on RAOI List



**N2011-1**

**United States Postal Service**

**Institutional**

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-63** Please refer to your response to Interrogatory PR/USPS-12 subpart [f].

- [a] Please advise when the Postal Service plans to file the first update to The List.
- [b] At what intervals does the Postal Service plan to file subsequent updates?
- [c] Please confirm, or explain if you are unable to confirm, that the updates to The List will consist of corrections and/or deletions and will not consist of additions.

**RESPONSE**

- (a) The week of September 19, 2011.
- (b) Monthly.
- (c) There is not intent to add facilities that should not be on the list.

Corrections and additions are not mutually exclusive.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-77** Please refer to your response to Interrogatory DBP/USPS-67.

- [a] Please confirm, or explain if you are unable to confirm, that the mail forwarding policies and costs will be the same whether the customer's change of address results from the discontinuance of a facility or results from an actual move by the customer.
- [b] Please confirm, or explain if you are unable to confirm, that when a post office is discontinued and a change of address is filed by a customer it will result to some categories of mail that will be forwarded postage due and the customer will have a cost if they want to receive the mail.
- [c] Please confirm, or explain if you are unable to confirm, that when a post office is discontinued and a change of address is filed by a customer it will result to some categories of mail that will not be forwarded to the customer.
- [d] Please explain why the customer who has been affected by the discontinuance of his facility by the action of the Postal Service will either have to pay postage due to receive some of his mail and/or will not receive all of the mail which was sent to his old address.

**RESPONSE**

- (a-d) Confirmed that mail forwarding costs and policies are the same, with the exception that customers filing Change of Address orders (COAs) in a discontinuance context are insulated from any forwarding charges for First-Class Mail, Express Mail, Periodicals, Package Services, and Parcel Select mail. DMM 507.2.2.3. However, customers impacted by discontinuance generally are not required to file a Change of Address. Only in situations where a customer's address cannot be duplicated at the gaining office, or where a customer chooses rural carrier delivery to replace P.O. Box service, will a customer need to file a COA. Parts (b-c) of this interrogatory simply seek confirmation of standard policies, while part (d) questions why Standard Mail is not forwarded without charge: no need to change procedures for Standard Mail (which mailers control via endorsements) was recognized.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-82** Please refer to Library Reference USPS LR N2011-1/11 filed on September 21, 2011. For each of the facilities no longer under consideration for discontinuance review, please advise the condition or conditions that led to that decision. The response should be facility specific and not generalities why the group of facilities was placed on the list.

**RESPONSE**

As was the case in the Station and Branch Optimization and Consolidation Initiative reviewed in Docket No. N2009-1, the Postal Service does not require local Retail Access Optimization Initiative discontinuance coordinators to systematically record such information as they perform preliminary analysis that leads them to narrow down the candidate pool and eliminate facilities from further consideration. Accordingly, under the circumstances, the Postal Service can offer the following:

Assuming each district was operating at the same pace in examining candidates, the first candidates to drop would likely be those for which it could be summarily determined that the facility was extremely isolated and alternate postal retail locations were virtually inaccessible to the community the candidate facility served. Not surprisingly, such circumstances are most likely to exist in the state of Alaska. Accordingly, Alaska facilities or those isolated by themselves on small islands in other states might drop off the list most rapidly without the need for more thorough analysis or a full-blown discontinuance study. In other circumstances, the existence of a cluster of relatively close candidate

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**RESPONSE to DBP/USPS82 (continued)**

facilities might lead to a local determination to eliminate from further consideration the one facility in the cluster most isolated from the others, especially if it appeared to have the least promising prospects for developing alternate access opportunities.

Additional factors that may lead to a facility being dropped from consideration relatively early during a top-down initiative without the need for a full-blown study could include existing leasehold obligations, the lack of space in a nearby gaining facility to accommodate the transfer of Post Office Box and other retail operations, or factors that surface during consideration of public input.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO NLP INTERROGATORY**

**NLP/USPS-16:** Please identify in full, or provide, all emails sent from postal computers (excluding incidental personal use) this year from Postal Service officials to Members of Congress which concern or relate to Post Office closings or consolidations.

**RESPONSE:**

USPS Library Reference N2011-1/22 contains copies of calendar year 2011 emails from USPS District discontinuance coordinators to members of Congress (and/or their staffs) regarding Post Office, station and branch discontinuance activity.

1. Please refer to the response to interrogatory USPS/NNA T1-5 discussing an example of postal officials prohibiting audio recordings, video recordings and still photographs from being taken at community meetings.

(a) Is it standard Postal Service practice to prohibit audio recordings, video recordings or still photographs from being taken at community meetings?

(b) If so, please describe, explain, and provide any documents related to such practice and the rationale for such activity.

(c) If such practice is discretionary, please identify the level of Postal management that has authority to prohibit audio recordings, video recordings or still photographs from being taken at community meetings.

(d) Please identify the criteria used by Postal Service management to make a determination on whether such a prohibition should occur.

(e) If it is not standard Postal Service practice to prohibit audio recordings, video recordings or still photographs from being taken at community meetings, please describe and explain what steps the Postal Service is taking, or plans to take in the future, to ensure that such activities do not occur.

(f) Please provide a list of discontinuance study facilities where Postal Service representatives have prohibited audio recordings, video recordings or still photographs being taken at community meetings since the inception of the Retail Access Optimization Initiative.

## RESPONSE

(a) Postal regulations in Handbook PO-101 preclude taping of meetings by postal officials so as not to inhibit discussion by participants (Handbook PO-101 § 251). There was no standard practice with respect to audio or visual taping practices by other persons until recently; prior to that time, decisions on whether to allow or prohibit such practices were made on an ad-hoc basis by postal officials conducting community meetings, often with a primary focus (driven by PO-101) of ensuring that customer inhibition was avoided. Recent discussion of the role the press, and audio and video recordation, have in discontinuance



**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO PRESIDING  
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community meetings has led to adoption of an open door policy allowing attendees to conduct non-disruptive photography and audiovisual recording at community discontinuance meetings; however, the policy does not change the need for local personnel to maintain order and preventing disruption of meetings. Any deviations from the open door policy should be approved by the Area Vice President in consultation with the Vice President, Delivery and Post Office Operations.

(b) N/A

(c) See response to (a).

(d) See response to (a).

(e) See response to (a).

(f) By polling field officials, the Postal Service has confirmed fourteen instances where some restriction was imposed. The discontinuance studies involved the following offices:

Dewitt, Kentucky 40930

Allendale, Missouri 64420

Cedarcreek, Missouri 65627

Davisville, Missouri 65456

Graham, Missouri 64455

Pickering, Missouri 64476

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO PRESIDING  
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Powersite, Missouri 65731

Rockbridge, Missouri 65741

Success, Missouri 65570

Rena Lara, Mississippi 38767

West Meridian Station, Mississippi 39307

Pocasset, Oklahoma 73079

Blandburg, Pennsylvania 16619

Defiance, Pennsylvania 16633

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

**PR/USPS-22**

Please discuss how the USPS-LR-1 handbook process requires the discontinuance team to:

- a. Identify if the facility under review is currently co-located with a BMEU?
- b. Isolate the revenue and costs associated with the BMEU?
- c. Evaluate the potential revenue loss associated with moving the BMEU?
- d. Solicit comments from mailers who use the BMEU regarding the effect of moving the BMEU?

**RESPONSE**

- (a) Such information is routinely noted despite the absence of an explicit instruction.
- (b) When *total* operating expenses and *total* revenue are calculated for a facility, they would include any associated with operation of a BMEU at that facility, should one exist, without being isolated.
- (c) As is the case with retail revenue, the discontinuance review process does not include the development of estimates of potential lost commercial revenue.
- (d) Irrespective of the presence of a BMEU, USPS Handbook PO-101 section 222.g requires that potentially affected bulk entry customers be identified for notification:

The district Bulk Mail Entry Unit (BMEU) provides a listing of permit mailers from the *PostalOne!* system. Additionally, the district BMEU should identify any drop shipment customers that may be affected by discontinuance.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

**PR/USPS-23**

In Library Reference Nonpublic 3, the Postal Service provided operating cost and operating revenue data for over 30000 postal retail locations.

- a. How many offices had Operating Revenue that exceeded Operating Cost in FY2010?
- b. How many RAO offices had Operating Revenue that exceeded Operating Cost in FY2010?
- c. If the Discontinuance study reveals that the office is, in fact, operating at a profit, how will that impact your evaluation of whether that post office should close?

**RESPONSE**

- (a) There were 5,512 postal retail facilities (at which total operating expenses and total revenue are tracked separately) where the revenues exceeded expenses in FY 2010.
- (b) Among RAO candidate facilities for which the Postal Service separately tracks total operating expenses and operating revenue, total operating revenue exceeded total operating expenses at 258 locations in FY 2010.
- (c) Whether total operating expense exceeds operating revenue (or vice versa) is not a dispositive factor in discontinuance determinations.

Postal Regulatory Commission  
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Accepted 10/26/2011

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE,  
2011

Docket No. N2011-1

**UNITED STATES POSTAL SERVICE NOTICE OF FILING  
LIBRARY REFERENCES USPS-LR-N2011-1/NP21 AND USPS-LR-N2011-1/25  
(October 26, 2011)**

The Postal Service files the material indicated below in this proceeding as  
Category 4 Library References responsive to Presiding Officer's Information Request  
No. 6 (October 24, 2011):

USPS-LR-N2011-1/NP21    Fiscal Year 2008 and 2009 Walk-In Revenue Data  
For All Retail Facilities [Non-Public]

USPS-LR-N2011-1/25      Fiscal Year 2008 and 2009 Walk-In Revenue Data  
For All Retail Facilities

Non-public library reference N2011-1/NP21 contains data responsive to the  
Presiding Officer's request for fiscal year 2008 and 2009 postal facility-specific walk-in-  
retail revenue. The Postal Service regards facility finance numbers and associated  
revenue figures to be commercially-sensitive and proprietary information that should not  
be released into the public domain. Accordingly, it is providing those data in  
unredacted USPS Library Reference N2011-1/NP21, as a non-public response to  
Presiding Officer's Information Request No. 6.

Library Reference N2011-1/25 consists of a public version of that same document, but with the finance numbers and revenue data redacted, reducing it to a mere list of the facilities for which data are reported. An application for non-public treatment of USPS Library Reference N2011-1/NP21 is attached to this Notice.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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October 26, 2011

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION POSED BY THE COMMISSION  
DURING CROSS-EXAMINATION ON OCTOBER 28, 2011**

1. If during the RAOI process, an office under review has its hours of operation reduced (for example from 20 to 15 hours), how does this information become a part of the discontinuance record to ensure appropriate review by those making the final determination to close a facility?

**RESPONSE**

Hours of operation are a basic fact about the office that must be reflected correctly in the administrative record and final determination. If that information changes, the administrative record needs to reflect that fact, whether by an updated Form 4920 (or its CSDC equivalent), or perhaps even a memo to the record by the discontinuance coordinator.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION POSED BY THE COMMISSION  
DURING CROSS-EXAMINATION ON OCTOBER 28, 2011**

2. Page 15, line 20 of witness Boldt's surrebuttal testimony, "while it may have been true in the past that tens of thousands of active employees had access to CSDC-1, including national officers of postal management associations, the application of a need-to-know constraint is true of all postal applications, especially in today's SOX environment. As with a wide variety of other postal data systems, CSDC-II now operates to deprive employees ....from access to the current CSDC II system." What is the connection between CSDC and SOX compliance?

**RESPONSE**

The connection is not a direct one. The simple observation is that the need for checks and balances, constraint upon who needs what information for what purpose, and who can change what data for any purpose, is increasingly necessary and appropriate in postal data systems as in any other data systems. SOX is a relatively well-known example of where checks upon data entry, data maintenance, and data changes are systematized as a way of providing additional security against fraudulent or wasteful conduct. That is the only intended connection.



**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION POSED BY THE COMMISSION  
DURING CROSS-EXAMINATION ON OCTOBER 28, 2011**

**3. What criteria does the Postal Service use to determine whether a postal retail facility will obtain a POS terminal?**

**RESPONSE**

Until FY 2011, Point of Sale terminals were only in Cost Ascertainment Group A-G offices. In FY2011, the Postal Service extended POS to include offices with annual walk-in revenue greater than \$100K. The Postal Service is in the process of converting those offices in FY 2012 (most of them are currently Integrated Retail Terminal offices).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION POSED BY THE COMMISSION  
DURING CROSS-EXAMINATION ON OCTOBER 28, 2011**

**4.** Please provide a list of the post offices on the RAOI candidate list that do not have access to the Postal Service's intranet.

**RESPONSE**

See the attached list of RAOI low earned workload Post Offices that do not have inter/intranet access.

Attachment to Response to PRC October 28 Question HR Question 4

		RAO Initiative
		Low Earned Workload
		Post Offices
		W/O Intra/Internet Access

Office	Finance Number	Type	Zip	Address	City	State
POINT BAKER	027098	MAIN_PO	99927	9998 STATE FLOAT	POINT BAKER	AK
ARTOIS	050354	MAIN_PO	95913	357 FRONT ST	ARTOIS	CA
SARGENTS	078100	MAIN_PO	81248	174 MEANS AVE	SARGENTS	CO
SAINT DONATUS	188019	MAIN_PO	52071	118 E 1ST ST	SAINT DONATUS	IA
AMO	170187	MAIN_PO	46103	4925 PEARL ST	AMO	IN
BRADFORD	170781	MAIN_PO	47107	3314 W BRADFORD RD NE	BRADFORD	IN
CENTRAL	171593	MAIN_PO	47110	7020 CENTRAL DR SW	CENTRAL	IN
FRIENDSHIP	173113	MAIN_PO	47021	5918 E MAIN ST	FRIENDSHIP	IN
PIERCEVILLE	176941	MAIN_PO	47039	4499 E STATE ROUTE 350	PIERCEVILLE	IN
ALPHA	200112	MAIN_PO	42603	234 OLD HAPPY TOP RD	ALPHA	KY
BASKETT	200440	MAIN_PO	42402	1015 2ND AVE	BASKETT	KY
CANE VALLEY	201236	MAIN_PO	42720	2303 CANE VALLEY RD	CANE VALLEY	KY
CANNEL CITY	201252	MAIN_PO	41408	9519 HIGHWAY 191	CANNEL CITY	KY
ELIZAVILLE	202444	MAIN_PO	41037	5035 ELIZAVILLE RD	ELIZAVILLE	KY
FORDS BRANCH	202864	MAIN_PO	41526	2730 KEWANEE RD	FORDS BRANCH	KY
HIMA	203744	MAIN_PO	40951	HIGHWAY 80 E	HIMA	KY
HOLLAND	203800	MAIN_PO	42153	8384 HOLLAND RD	HOLLAND	KY
JETSON	204120	MAIN_PO	42252	10339 BROWNSVILLE RD	JETSON	KY
KENTON	204228	MAIN_PO	41053	14079 DECOURSEY PIKE	KENTON	KY
KNOB LICK	204340	MAIN_PO	42154	5260 SULPHUR WELL KNOB LICK RD	KNOB LICK	KY
LONE	204752	MAIN_PO	41347	2297 HIGHWAY 708 W	LONE	KY
MALONE	204984	MAIN_PO	41451	2570 HIGHWAY 191	MALONE	KY
MASON	205100	MAIN_PO	41054	8415 DIXIE HWY	MASON	KY
MILFORD	205228	MAIN_PO	41061	6503 POWERSVILLE HARRISON COUNTY RD	MILFORD	KY
MUSES MILLS	205520	MAIN_PO	41065	6 RYAN RD	MUSES MILLS	KY
PLUMMERS LANDING	206208	MAIN_PO	41081	591 PLUMMERS LANDING RD	PLUMMERS LANDING	KY
SITKA	206248	MAIN_PO	41255	2474 KY ROUTE 201	SITKA	KY
WEST LOUISVILLE	208244	MAIN_PO	42377	7005 STATE ROUTE 815	WEST LOUISVILLE	KY

WILDIE	208368	MAIN_PO	40492	1419 WILDIE RD	WILDIE	KY
WINDSOR	208436	MAIN_PO	42565	3593 KY 80	WINDSOR	KY
WOODBURY	208516	MAIN_PO	42288	74 BARREN RIVER RD	WOODBURY	KY
CUTTYHUNK	241683	MAIN_PO	2713	13A BROADWAY	CUTTYHUNK	MA
MC GRATH	265820	MAIN_PO	56350	300 MAIN ST W	MC GRATH	MN
MARYSVILLE	295544	MAIN_PO	59640	1 ASPEN WAY	MARYSVILLE	MT
BOWERSVILLE	380959	MAIN_PO	45307	3180 MAYSVILLE ST	BOWERSVILLE	OH
CABLE	381218	MAIN_PO	43009	3582 MAIN ST	CABLE	OH
COLTON	381764	MAIN_PO	43510	637 HENRY ST	COLTON	OH
DECATUR	382107	MAIN_PO	45115	6471 HUFF HILL RD	DECATUR	OH
ELGIN	382499	MAIN_PO	45838	18100 SANDS RD	ELGIN	OH
FARMER	382653	MAIN_PO	43520	3948 STATE ROUTE 2	FARMER	OH
HOYTVILLE	383724	MAIN_PO	43529	2521 N MAIN ST	HOYTVILLE	OH
ISLE SAINT GEORGE	383829	MAIN_PO	43436	165 E TUHAN RD	ISLE SAINT GEORGE	OH
KUNKLE	384158	MAIN_PO	43531	104 E ANGOLA ST	KUNKLE	OH
LATTY	384305	MAIN_PO	45855	380 2ND ST	LATTY	OH
LEES CREEK	384368	MAIN_PO	45138	9 LARRICK RD	LEES CREEK	OH
MC GUFFEY	384760	MAIN_PO	45859	402 COURTRIGHT ST	MC GUFFEY	OH
PALESTINE	386405	MAIN_PO	45352	105 W CROSS ST	PALESTINE	OH
PEMBERTON	386503	MAIN_PO	45353	6673 PALESTINE ST	PEMBERTON	OH
POTSDAM	386825	MAIN_PO	45361	2 W CROSS ST	POTSDAM	OH
REESVILLE	386986	MAIN_PO	45166	540 N STATE ROUTE 72	REESVILLE	OH
ROCKY RIDGE	387168	MAIN_PO	43458	14800 W 3RD	ROCKY RIDGE	OH
WEST MILLGROVE	388890	MAIN_PO	43467	6491 MAIN ST	WEST MILLGROVE	OH
WREN	389184	MAIN_PO	45899	119 STATE ROUTE 49	WREN	OH
MANNBORO	515598	MAIN_PO	23105	3800 RICHMOND RD	MANNBORO	VA
MEREDITHVILLE	515820	MAIN_PO	23873	4771 BOYDTON PLANK RD	MEREDITHVILLE	VA
SCHLEY	518058	MAIN_PO	23154	5778 WARE NECK RD	SCHLEY	VA
STEHEKIN	548148	MAIN_PO	98852	31 DEFACTO LN	STEHEKIN	WA
WALDRON	548946	MAIN_PO	98297	1 S BURN RD	WALDRON	WA

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION POSED BY THE COMMISSION  
DURING CROSS-EXAMINATION ON OCTOBER 28, 2011**

5. During cross-examination of witness Ruiz, he mentioned that he has an annual report going back three years which indicates the hours of operation for each Post Office, branch, and station on the RAOI candidate list as well as annual revenues for each RAOI candidate office during that same timeframe. Please have Mr. Ruiz search his records and provide the information he has pairing hours of operation and walk-in revenue for those offices for the last three years.

**RESPONSE**

Mr. Ruiz has checked his records. As he indicated at page 1778 of Tr. Vol. 5, he has an archival one-time snapshot in the Small Office Variance database of what the operating hours were reported to be on the final week of each of the past three fiscal years (FY 2009, 2010 and 2011) for retail facilities in SOV. The data are filed in USPS Library Reference N2011-1/NP22, which is accompanied by the public version in USPS Library Reference N2011-1/26 from which facility finance numbers have been redacted.

FY 2008-10 walk-in revenues for all retail facilities were filed in USPS Library Reference N2011-1/25 on October 26, 2011.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION POSED BY THE COMMISSION  
DURING CROSS-EXAMINATION ON OCTOBER 28, 2011**

6. Please provide the most updated list possible of RAOI candidate offices that have had a Final Determination to Close the facility posted in that facility. Similarly, please provide the most updated list possible of RAOI candidate offices that have been removed from consideration for closure under the Initiative.

**RESPONSE**

As of November 1, 2011, no Final Determinations have been posted as part of the RAO Initiative. An updated USPS Library Reference N2011-1/11 is being filed today, as previously scheduled, to reflect the RAO Initiative candidate facilities eliminated from consideration as of the end of October, 2011.

**POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001**

**Retail Access Optimization Initiative**

**Docket No. N2011-1**

**Notice Of Additional Material Provided By The National League Of Postmasters  
Per The Request Of The Commission  
During The Hearings Held On October 17 And 18, 2011.  
(October 20, 2011)**

The National league of Postmasters hereby submits the attached material per the requests of the Commission during the cross-examination of League witnesses earlier this week. The Commission asked that we try to produce as much as we could before the close of business on October 20, 2011.

Because of the production process involved in compiling the material, the League was unable to make this filing by the electronic filing deadline of 4:30 but and thus is filing this material on Thursday October 20, after the 4:30 filing cutoff. We did email this material to Mr. Tidwell so that he would receive it on Thursday and would not have to wait until the material posted on Friday the 21<sup>st</sup>.

The materials fall into seven groups, and is attached to this pleading:

- Material on Postal Service Community meetings.
- Materials suggesting that the decision to close was already made before the community meetings.
- Materials suggesting that the goal of this initiative was to save money.
- Materials concerning the "loyalty" oath that suggested that postmasters should not be informing their community of what is happening.
- Materials following up to Interrogatory USPS/NLPM-T1-37 showing how material on internet use was gathered in those three communities.

- Materials showing the relationship between the timing of community meetings and the start of closure proceedings that illustrate that a predetermined decision was made to close the office.
- Materials showing the roughly 7/10s of one percent calculation used in the response to USPS/NLPM-RT1-34

Were the time frame not so abbreviated, we feel confident that a much more extensive compendium of information on these issues could have been gathered. Much of this information, of course, is within the Postal Service's possession and could have been compiled by the Postal Service itself, should it have wanted to do so.

/s/ Robert J. Brinkman

---

Robert J. Brinkmann  
 Law Offices of Robert J. Brinkmann LLC  
 1730 M St. N.W. Suite 200  
 Washington, D.C. 20036  
 202-331-3037; 202.331-3029 (f)  
[robert.brinkmann@rjbrinkmann.com](mailto:robert.brinkmann@rjbrinkmann.com)

/s/ Harold Hughes

---

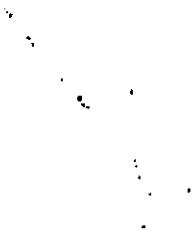
Harold Hughes  
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*Counsel for the National League of  
 Postmasters of the United States*



Please see attachments;

1. Community Meetings, time of day, joint with other communities, no District Manager or POOM as required.
2. Comments that say or insinuate to the community to believe that decision is done.
3. Goal is to save money
4. Loyalty Oath leading to intimidation
5. How Internet Survey was accomplished
6. 60 day notice for Proposed closure with errors
7. Formula for 7/10s of one percent

#1 Community Meetings



# South Dakota

Office	City	Zip Code	Meeting Time	Meeting Place
AGAR	AGAR	57520	6:00pm	
ALLEN	ALLEN	57714	2:00pm	Allen CAP office
ANDOVER	ANDOVER	57422	5:30pm	
ASHTON	ASHTON	57424	12:00pm	Community aHall
BADGER	BADGER	57214	1:00pm	Legion Hall
BARNARD	BARNARD	57426	7:30pm	
BELVIDERE	BELVIDERE	57521		
BRENTFORD	BRENTFORD	57429	8:30am	Fire Hall
BULLHEAD	BULLHEAD	57621	4:00pm	RC Scholl Gym
CANOVA	CANOVA	57321	12:00pm	Service Hall
CAPUTA	CAPUTA	57725	7:00pm	Church
CARPENTER	CARPENTER	57322	12:00pm	Community Room
CARTHAGE	CARTHAGE	57323	12:00pm	Community Center
CAVOUR	CAVOUR	57324	5:30pm	
CLAIRE CITY	CLAIRE CITY	57224	10:00am	Community Center
CORONA	CORONA	57227	10:00am	Community Center
CRESBARD	CRESBARD	57435	5:30pm	
DAVIS	DAVIS	57021	10:00am	Fire Hall
DIMOCK	DIMOCK	57331	12:00pm	St Peter & Paul Church
EDEN	EDEN	57232	3:00pm	Sacred heart Parish Hall
ENNING	ENNING	57737	11:00am	Ambulance Hall
FAIRBURN	FAIRBURN	57738	12:00pm	Community Center
FRANKFORT	FRANKFORT	57440	5:30pm	
FULTON	FULTON	57340	5:30pm	
GANN VALLEY	GANN VALLEY	57341	5:30pm	
GLENHAM	GLENHAM	57631	3:30pm	Town/Fire Hall
GOODWIN	GOODWIN	57238	1:00pm	Fire Hall
GRENVILLE	GRENVILLE	57239	2:30pm	American Legion Hall
HAMILL	HAMILL	57534	10:00am	Hamill hall
HAZEL	HAZEL	57242	10:00am	Community Center
HENRY	HENRY	57243	1:00pm	Community Hall
HERRICK	HERRICK	57538	3:00pm	Legion Hall
HOWES	HOWES	57748	6:00pm	
KRANZBURG	KRANZBURG	57245	10:00am	School Gym
LAKE CITY	LAKE CITY	57247		
LANTRY	LANTRY	57636	10:00am	Post Office
LESTERVILLE	LESTERVILLE	57040	1:00pm	Fire/Town Hall
LETCHER	LETCHER	57359	5:30pm	
LITTLE EAGLE	LITTLE EAGLE	57639	6:00pm	
MANDERSON	MANDERSON	57756	5:00pm	
MANSFIELD	MANSFIELD	57460	2:00pm	Church
MARVIN	MARVIN	57251	1:00pm	Community hall

# South Dakota

MEADOW	MEADOW	57644	11:30am	Smokey's Restaurant
MILESVILLE	MILESVILLE	57553	8:00pm	
MISSION HILL	MISSION HILL	57046	1:00pm	City Hall
MOUND CITY	MOUND CITY	57646	5:30pm	
NORRIS	NORRIS	57560	6:30pm	
NUNDA	NUNDA	57050	1:00pm	Fire Hall
OKREEK	OKREEK	57563	1:00pm	Community Center
OLDHAM	OLDHAM	57051	10:00am	Oldham Gym
OLIVET	OLIVET	57052	3:30pm	Hutchinson County Courthouse
ONAKA	ONAKA	57466	12:00pm	Community Kitchen
PEEVER	PEEVER	57257		
PIERPONT	PIERPONT	57468	7:30pm	
PRINGLE	PRINGLE	57773	9:00am	Fire hall
RAMONA	RAMONA	57054	1:00pm	High School Gym
RAYMOND	RAYMOND	57258	4:00pm	Fire House
REDIG	REDIG	57776	3:00pm	Post Office
REE HEIGHTS	REE HEIGHTS	57371	12:00pm	Auditorium
REVA	REVA	57651	9:00am	Reva Hall
REVILLO	REVILLO	57259	3:30pm	Community Center
RIDGEVIEW	RIDGEVIEW	57652	2:00pm	Church Hall
ROCKHAM	ROCKHAM	57470	12:00pm	Community Center
SAINT ONGE	SAINT ONGE	57779	7:00pm	
SCENIC	SCENIC	57780	3:30pm	Community Center
SENECA	SENECA	57473	5:30pm	
SINAI	SINAI	57061		
SPENCER	SPENCER	57374		
TOLSTOY	TOLSTOY	57475	5:30pm	
TURTON	TURTON	57477		
UTICA	UTICA	57067	10:00am	Old School
VALE	VALE	57788	7:00pm	
VOLIN	VOLIN	57072	10:00am	Post Office
WAKPALA	WAKPALA	57658	1:00pm	Community Center
WALLACE	WALLACE	57272	1:00pm	Town Hall
WESTPORT	WESTPORT	57481	5:30pm	
WHITE OWL	WHITE OWL	57792	2:00pm	Community Hall
WINFRED	WINFRED	57076	3:00pm	Fire Hall
WOOD	WOOD	57585	4:00pm	Community Hall
WOUNDED KNEE	KNEE	57794	4:00pm	Church

**Mark Strong****Subject:**

FW: Testimony

# 1

Colorado and Wyoming #1 Time, DM or POOM, Combining meetings.

I need to follow-up on a couple items. **For those who have responded on the earlier emails on time of meeting, notes being taken etc do not respond again for those items just to new questions.**

1. If anyone had a DM at a community meeting, need place and date. No DM in any responses.
2. Any meeting in your state that did not have a DM or POOM at the community meeting, need date and town.

# 1

8/29 Matheson  
 9/6 Ward (public affairs officer?)  
 10/17 Bond (POOM told local PM to go in her place)  
 9/14 Merideth  
 9/15 Sedgewick  
 (?) Wheatland, WY  
 9/26 Arapahoe  
 9/18 Parshall  
 9/28 Eckley

3. Any meeting scheduled before 5 PM, I need date and location.

X 1

Chama has been rescheduled for 2PM on 11/9 (original meeting was also @ 2PM)  
 Meeting for Mesa Verde was cancelled due to snow a couple of weeks ago. Alternate dates given to the PM are Halloween and Thanksgiving weekend...plus most of the park service employees will be gone by then.

4. Any meeting that it was obvious that notes were not being taken, location and date.
5. Any meeting that was combined with another town, in one location. Village A and Village B both being closed, meeting held in Village A.

# 1

Amherst and Paoli on 9/26 - held in Holyoke  
 Model and Hoehne held in Hoehne  
 Anton and Lindon held in Anton

MONTANA

**Mark Strong**

**Subject:** FW: Testimony  
**Attachments:** 090111PostOfficeCommunityMeetings.pdf

MTT

#1

Time  
NO ACCOMMODATION

-----Original Message-----

From: Mark Strong &lt;mstrong@postmasters.org&gt;

Sent: Tue, Oct 11, 2011 5:02 pm

Subject: Testimony

Names of community in all cases. if it is all on one page I am better off.

Meetings where the meeting started off with this meeting will be one hour and one hour only. **At the beginning of meetings, it was stated that the meeting would last approx. an hour, but not aware of any that were cut off before being completed.**

Meetings that were scheduled during the middle of the day. **18 of 85 MT meetings were/are scheduled for prior to 5 p.m. 5 p.m. is not really an ideal time either, for commuters, etc. Please see the list on Baucus' website for all the times.**

Meetings that were combined. **none that we are aware of; Ethridge & Kevin, same day & place, but at a different time**

Meetings conducted without a DM or POOM - **Acting MPOO has been at all the meetings for offices in the WEST. For the 50 offices in the EAST, no MPOO was/is scheduled to be at 13 meetings. Other representatives have been postmasters from other higher level offices, such as Livingston, Baker, Plentywood, Sheppard, Gardiner, Havre & Circle. Some meetings have had 2 representatives, some only one.**

Meetings with a DM - **none that we know of so far**

Meetings where they did not take notes. **On the EAST, some postmasters have been asked to be the notetakers at their own meetings, such as the ones that have only one representative there. There were some concerns with the way the notes were to be taken, possible not word for word, but outlined general responses.**

Anything else that will help show they are not taking into consideration the community needs. I have until Thursday to get all this info, and get it into a book to use.

Mark Strong  
 National League of Postmasters

MT

## Post Office Community Meetings

Below please find a list of scheduled meetings, according to information Senator Baucus' office has received from the U.S. Postal Service. Note, many meetings are listed as TBD, or too be determined, because the Post Office has yet to schedule them. Please check back frequently as this list will continue to be updated as Senator Baucus' office receives more information from the Postal Service. For more information about times and locations of meetings please call your local post office.

Town	Meeting Date	Time	Location
Alzada	Aug. 31	6:00 p.m.	Community Hall
Angela	Oct. 12	6:30 p.m.	Rock Springs Hall (7 miles north of Angela on Hwy 59N and then right ½ mile)
Antelope	Oct. 4	5:30 p.m.	Community Center
Avon	Sept. 6	4:30 p.m.	Community Clubhouse
Basin	Oct. 14	6:00 p.m.	Basin Community Hall
Bearcreek	Oct. 18	5:30 p.m.	Bearcreek Town Hall
Biddle	Oct. 20	5:30 p.m.	Biddle Community Heritage Center
Bighorn	Oct. 26	3:00-5:00 p.m.	USPS rep at Bighorn Post Office
Birney	Oct. 26	4:15 p.m.	Birney School
Bloomfield	Sept. 28	6:30 p.m.	Bloomfield School
Boyes	Sept. 28	6:00 p.m.	Boyes Community Hall
Brockway	Sept. 8	7:00 p.m.	Community Hall
Brusett	Oct. 25	6:30 p.m.	Fairview Community Hall
Buffalo	Oct. 6	5:30 p.m.	Buffalo Community Church
Bynum	Sept. 26	4:00 p.m.	Bynum Gym
Coffee Creek	Sept. 29	3:00 p.m.	Coffee Creek Church
Cohagen	Oct. 25	6:30 p.m.	Cohagen Community Hall
Dagmar	Oct. 5	5:30 p.m.	Dagmar Central
Decker	Oct. 27	3:30 p.m.	Spring Creek School/Community Center
Divide	Sept. 20	5:00 p.m.	Divide Grange
Dixon	Sept. 1	10:00 a.m.	Senior Center
Dupuyer	Sept. 30	5:30 p.m.	Dupuyer Community Hall
Elliston	Sept. 7	5:30 p.m.	School Gym
Elmo	Aug. 31	6:00 p.m.	Community Center
Ethridge	Sept. 27	5:30 p.m.	Kevin Senior Center
Flaxville	Oct. 26	5:30 p.m.	Lutheran Church, 108 1 <sup>st</sup> Ave. W.
Galata	Sept. 28	2:00 p.m.	Galata Community Hall
Garryowen	Oct. 19	2:30 p.m.	The Space adjacent to Post Office
Greycliff	Sept. 13	6:30 p.m.	Elementary School
Hammond	Sept. 14	2:30 p.m.	Boyes Community Hall on Hwy 212
Heart Butte	Oct. 3	5:00 p.m.	Heart Butte School (multipurpose room)
Helmville	Sept. 1	5:00 p.m.	Community Center
Highwood	Oct. 12	6:00 p.m.	Highwood School
Hingham	Oct. 5	6:30 p.m.	Hi-Line Community Church

Hogeland	Sept. 28	6:30 p.m.	American Lutheran Church
Ingomar	Oct. 27	6:00 p.m.	Tri-Rec Gymnasium
Inverness	Oct. 12	5:30 p.m.	Inverness Sacred Heart Catholic Church
Jackson	Sept. 19	5:00 p.m.	Jackson School multi-purpose room
Joplin	Oct. 18	5:30 p.m.	Joplin Community Hall
Kevin	Sept. 27	7:00 p.m.	Kevin Senior Center
Kremlin	Oct. 4	6:30 p.m.	Kremlin Lutheran Church
Lindsay	Sept. 16	8:30 a.m.	Lindsay Hall
Loma	Sept. 28	6:00 p.m.	Loma Memorial Hall
Loring	Oct. 25	3:00 p.m.	Loring Hall
Martinsdale	Oct. 4	5:30 p.m.	Community Hall
Marysville	Oct. 14	2:00 p.m.	Marysville Pioneer Building
Mc Leod	Sept. 22	6:30 p.m.	Meleod School
Melrose	Sept. 8	2:00 p.m.	School Auditorium
Melville	Sept. 14	7:00 p.m.	Melville Lutheran Church
Moccasin	Sept. 29	5:30 p.m.	Benchland Community Hall
Monarch	Oct. 11	7:00 p.m.	Monarch Fire Hall
Musselshell	Aug. 24	7:00 p.m.	School
Neihart	Oct. 5	7:00 p.m.	Monarch-Neihart Senior Center
Norris	Sept. 21	6:00 p.m.	Wells Conference Rm. 105 Sterling Rd.
Olney	Aug. 30	5:30 p.m.	Fire Hall
Otter	Oct. 26	9 a.m.- 1:30 p.m.	USPS rep at Otter Post Office
Outlook	Oct. 12	5:30 p.m.	Outlook City Building
Peerless	Oct. 19	5:30 p.m.	Lutheran Church
Pendroy	Sept. 26	6:00 p.m.	Pendroy School
Pompeys Pillar	Oct. 20	5:30 p.m.	Fire Hall
Pony	Sept. 21	4:00 p.m.	Pony School Gym
Rapelje	Oct. 12	6:00 p.m.	Rapelje School
Raymond	Oct. 11	5:30 p.m.	Raymond Community Center
Raynesford	Oct. 4	7:00 p.m.	Raynesford Community Center
Reserve	Oct. 18	5:30 p.m.	Reserve Fire Hall
Ringling	Oct. 13	7:00 p.m.	Ringling School
Rosebud	Oct. 18	6:00 p.m.	Rosebud School
Saint Xavier	Oct. 13	3:30 p.m.	Pretty Eagle School
Sand Springs	Oct. 18	6:30 p.m.	Sand Springs Community Church
Stryker	Aug. 30	3:00 p.m.	Post Office
Sumatra	Oct. 27	3:00 p.m.	Tri-Rec Gymnasium
Toston	Oct. 17	6:30 p.m.	Crow Creek Valley Church
Two Dot	Oct. 5	5:30 p.m.	Two Dot Community Club/Fire Hall
Vida	Sept. 7	7:00 p.m.	Vida School
Volborg	Oct. 12	5:30 p.m.	Volborg Post Office
Warm Springs	Sept. 8	5:30 p.m.	2 <sup>nd</sup> Fl. Classroom, Admin Annex Bld. 58 Garnet Way
Whitetail	Oct. 25	5:30 p.m.	Fire Hall
Whitewater	Oct. 25	5:30 p.m.	Whitewater School



Whitlash	Oct. 13	6:00 p.m.	Whitlash Community Hall
Willow Creek	Sept. 22	6:00 p.m.	Willow Creek Firehall
Wisdom	Sept. 19	2:00 p.m.	Wisdom Community Building
Wise River	Sept. 19	1:00 a.m.	Wise River Community Building
Wyola	Oct. 18	3:30 p.m.	Wyola School Gym/ Cafeteria
Zortman	Oct. 27	5:30 p.m.	Zortman Mining Office
Zurich	Sept. 29	6:30 p.m.	Zurich Elementary School

**Mark Strong**

---

**Subject:** FW: FW: Testimony

#1

**Sent:** Wednesday, October 12, 2011 7:04 PM  
**To:** Mark Strong  
**Subject:** Re: FW: Testimony

These are ones I am for sure about but I'd imagine there are more...

Fortuna, MO meeting held at 9:00 a.m. - Sept 13, 2011

Following offices had no MPOO or District Manager at the community meeting:

Amity, MO  
 Turney, MO  
 Clearmont, MO  
 Denver, MO  
 Allendale, MO  
 Pickering, MO  
 Clyde, MO  
 Parnell, MO  
 Foster, MO  
 Amoret, MO

----- Original Message -----

From: Mark Strong <mstrong@postmasters.org>  
 To: athiker50@gmail.com, dwweber@earthlink.net; John and Lucy Olson <Olson233@runestone.net>, sean acord <sean.acord@hotmail.com>, pamp02@embarqmail.com  
 Sent: Wed, 12 Oct 2011 06:50:16 -0400 (EDT)  
 Subject: FW: Testimony

~~PA~~ meant to send this to you. AC and Board members you can forward to your states to see if they have any input.

Mark Strong  
 National League of Postmasters

---

**Mark Strong**

---

**Subject:**

FW: Testimony

IOWA  
#1

**From:**

**Sent:** Tuesday, October 11, 2011 8:20 PM

**To:** Mark Strong;

**Cc:** Mark Strong

**Subject:** Re: Testimony

I am finishing up my cross examination interrogatories. One of the items they are questioning is my comment that community meetings were not being conducted properly and that the were canned presentations. Some or most of you have sent me info. It needs to be done from your home computer.

Names of community in all cases. if it is all on one page I am better off.

Meetings where the meeting started off with this meeting will be one hour and one hour only. Dana, IA Bouton, IA Bridgewater, IA

Meetings that were scheduled during the middle of the day. None in Hawkeye

Meetings that were combined. None in Hawkeye

Meetings conducted without a DM or POOM Barnes City, IA

Meetings with a DM The DM has never been to a meeting in Hawkeye

Meetings where they did not take notes. Dana, IA

Anything else that will help show they are not taking into consideration the community needs. I have until Thursday to get all this info, and get it into a book to use.

Mark Strong

National League of Postmasters

# 1  
# 6 Proposal**Mark Strong****Subject:** FW: Testimony  
**Attachments:** TOWNHALL MEETING SCHEDULE2.doc

Central IL

**Sent:** Wednesday, October 12, 2011 9:39 PM**To:** Mark Strong**Subject:** Fw: Testimony

Mark,

# ) I have attached the meeting schedule for the 614-615 POOM area 8 for Central IL. None of the meetings that have been held so far have had a POOM or a DM in attendance. They are being conducted by one of three Postmasters that have been designated by the POOM, Amy Clark, PM of Chillicothe IL, Wendy Gobin, PM of Rio IL, and Laura Rolffs, PM of Galesburg IL. The Poom is Tom Lister and he has stated to the Postmasters of the affected offices that he will not be attending any of the town hall meetings. The Postmaster that conducts the meeting also takes notes, somewhat. My area, Poom area 9 has just started the meetings for 613 and 617 this week. They are starting at 4:30 at one office, 6:00 at another, and 7:30 at another. No DM will be in attendance, the Poom will be at alot of them and the District Closure coordinator will be at the rest.

Another issue is the offices in Gateway that are already receiving the posting for closure. West Point IL and Basco IL reported today that they were sent postings that were full of mistakes. Basco Postmaster Karen Morehouse just called me now. Her posting says that the Postmaster position became vacant when the PM retired on August 1, 2011. (That's her and she never retired. ) 2 craft employees assigned to this unit will be reassigned (only has 1 rural carrier and 1 PMR)

# ) The biggest misstatement is the figures used. Says closing this post office will net a ten year savings of \$1,681,238. ( this is a level 11 office) Another small thing, says the closest post office is 10 miles away when it is actually 11. Karen also says that the FY 11 revenue is not reported, only FY 10. Her revenue for FY 11 is up \$6,000.00 but that was omitted.

I think that's all I have for now.

**Mark Strong**

---

**Subject:** FW: Testimony

ARKANSAS  
#1

**From:**

**Sent:** Wednesday, October 12, 2011 12:51 PM

**To:** Mark Strong

**Subject:** Re: Testimony

On Oct 11, 2011, at 6:02 PM, Mark Strong <[mstrong@postmasters.org](mailto:mstrong@postmasters.org)> wrote:

I am finishing up my cross examination interrogatories. One of the items they are questioning is my comment that community meetings were not being conducted properly and that the were canned presentations. Some or most of you have sent me info. It needs to be done from your home computer.

Names of community in all cases. if it is all on one page I am better off.

Meetings where the meeting started off with this meeting will be one hour and one hour only.

Fisher  
Datto  
Alleene  
Antoine  
Cale

\*This is typical in Arkansas. Most meetings are started this way. The ones listed above are meetings that a board member attended and witnessed the statement being made.

Meetings that were scheduled during the middle of the day.  
None in Arkansas.

Meetings that were combined.  
None in Arkansas

Meetings conducted without a DM or POOM

Friendship, AR  
Cale, AR  
Saratoga, AR  
Antoine, AR

Meetings with a DM

None in Arkansas.

Meetings where they did not take notes.

no notes

Fisher, AR

Cale, AR

Saratoga, AR

Alleene, AR

Beirne, AR

Peach Orchard, AR

Antoine, AR

1-2

# 1  
Note second  
page

## Points of Concern at Town Meetings in Arkansas

Alleene 8/30/11

- Postmaster and OIC were told to sit on the stage with the MPOO and the Discontinuance Coordinator. The PMR/OIC was put on the spot by being asked if she would keep this job for 1 hour a day.
- The District is not taking any notes or documenting the questions and comments at the community meetings. The Coordinator is telling the attendees that nothing they say there will go into the record and that the only way it will be in the record will be if they send a letter to the address in the survey.
- The address in the survey and on the proposal is for the Discontinuance Coordinator. The Handbook PO 101 states that the comments will be sent to the Manager Consumer and Industry Contact (242.14) who is responsible for answering questionnaires as appropriate and ensuring that the Discontinuance Coordinator has a copy.
- There is a statement in the handbook referencing a designated address for all mail coming in from customers, such as a dedicated P O Box number. Our District is using their regular mailing address.
- The Coordinator announced that the meeting would end promptly after one hour and that each customer was limited to 2 minutes for comments and questions.
- The Coordinator tells the attendees more than once that they can get a box on the route that serves their area. Then she states that if they ARE ON the line of travel they will have to request an extension and have the Postmaster approve it. She states that if they request an extension they must have 4 customers per ½ mile in travel to be approved....but they can always get their mail on the route instead of traveling to use the PO Boxes..... The community is told that adding those deliveries to a rural carrier will be no extra cost. Later she tells the customers that rural delivery is not automatic that they have to petition for it.
- She did not tell the customers what the price of the P O Boxes would be in the new location if they kept their boxes.
- The Coordinator does not check in the communities to see if there is anyone interested in opening a VPO or Contract Unit. The Handbook states they will have all this BEFORE the meeting and know if it is cost effective to do that. The Coordinator tells the community it is their responsibility to find someone that is interested, IF this is what the community chooses.
- The Coordinator states many times that this is not the only office being studied for closure.....she also says they have already closed others in Little Rock and Fayetteville. Of course we know those were stations.
- The Coordinator is argumentative and engaged a customer in arguing about driving to do business with us. She argued about where they buy groceries and gasoline.

2-2

X

- The Coordinator tells the customers that there is no law stating that the USPS can't close a Post Office for financial reasons only. She said that the law was changed in the PO 101. When a customer speaks about the requirement for Maximum Service and etc the Coordinator told him that the "reorganization does not say that about maximum service". She states that the maximum degree of service for Alleene is the 9 miles to Winthrop and that satisfies that requirement. NOTE: first she says there is no requirement and the she says this will satisfy the requirement.
- Customer asked the Coordinator what the options they had to save their Post Office. The answer she gave was: "I can't answer that. It is not my job. I can't do that and keep my job. My job is not to help you." Then she begins talking about how many hours she works a day and only gets paid for 8 hrs.



#1

Time of Day

Gateway  
District

1936

GREAT LAKES	Level	Start Date	DM Study Approve	MPDO 1st Rev	DM Approve PROP	COMM Meet Date	Comm Meet Time	PROP Post Date
630-MO-ARMSTRONG (MAIN_PO)	13	8/16/2011	8/8/2011	Done	Done	9/29/2011	10:00 A.M.	10/4/2011
630-IL-BATH (MAIN_PO)	13	9/7/2011	8/9/2011	Done	Done	9/7/2011	3:00 P.M.	10/1/2011
630-MO-BLACKBURN (MAIN_PO)	11	8/30/2011	8/9/2011	Done	Done	9/6/2011	1:00 P.M.	8/31/2011
630-IL-BLUFF SPRINGS (MAIN_PO)	53	8/25/2011	8/17/2011	Done	Done	9/23/2011	3:00 P.M.	8/26/2011
630-IL-EAGARVILLE (MAIN_PO)	53	8/25/2011	8/9/2011	Done	Done	9/9/2011	2:00 P.M.	10/4/2011
630-IL-EWING (MAIN_PO)	13	8/18/2011	8/9/2011	Done	Done	9/22/2011	4:30 P.M.	10/1/2011
630-MO-FERGUSON (BRANCH)	20	8/12/2011	8/12/2011	Done	Done	9/15/2011	3:00 P.M.	10/4/2011
630-MO-FLETCHER (MAIN_PO)	11	8/25/2011	8/19/2011	Done	Done	8/25/2011	1:00 P.M.	8/26/2011
630-MO-FORTUNA (MAIN_PO)	11	8/18/2011	8/9/2011	Done	Done	9/13/2011	9:00 A.M.	10/6/2011
630-MO-FRANKLIN (MAIN_PO)	11	8/18/2011	8/19/2011	Done	Done	9/6/2011	3:30 P.M.	8/26/2011
630-MO-GILLIAM (MAIN_PO)	11	8/18/2011	8/9/2011	Done	Done	9/16/2011	4:30 P.M.	10/6/2011
630-IL-GLENARM (MAIN_PO)	11	8/26/2011	8/8/2011	Done	Done	9/15/2011	3:00 P.M.	8/26/2011

MO

(VPO)-630-MO-GWEN B GILES (STATION)	20	8/18/2011	8/16/2011	Done	Done	9/8/2011	3:00 P.M.	10/1/2011
630-MO-HOLLIDAY (MAIN_PO)	13	8/18/2011	8/9/2011	Done	Done	10/6/2011	10:00 A.M.	8/26/2011
630-MO-JEFFERSON MEMORIAL (FIN_S)	0	8/18/2011	8/12/2011	Done	Done	9/22/2011	3:00 P.M.	10/1/2011
(VPO)-630-MO-JORDAN W CHAMBERS (FIN_S)	0	8/18/2011	8/12/2011	Done	Done	9/22/2011	3:00 P.M.	10/6/2011
630-IL-KANE (MAIN_PO)	11	8/25/2011	8/9/2011	Done	Done	9/15/2011	1:00 P.M.	9/27/2011
630-IL-KEENSBURG (MAIN_PO)	11	8/25/2011	8/9/2011	Done	Done	9/20/2011	4:30 P.M.	10/1/2011
630-IL-LOGAN (MAIN_PO)	11	8/25/2011	8/9/2011	Done	Done	10/11/2011	4:30 P.M.	10/1/2011
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(VPO)-630-MO-MAPLEWOOD (BRANCH)	19	8/18/2011	8/12/2011	Done	Done	9/13/2011	3:00 P.M.	10/1/2011
630-IL-MAUNIE (MAIN_PO)	55	8/25/2011	8/9/2011	Done	Done	10/4/2011	4:30 P.M.	10/1/2011
630-IL-MILL SHOALS (MAIN_PO)	11	8/18/2011	8/9/2011	Done	Done	9/26/2011	4:30 P.M.	10/1/2011
630-IL-MOUNT ERIE (MAIN_PO)	11	8/18/2011	8/9/2011	Done	Done	9/12/2011	4:30 P.M.	9/27/2011

630-IL-MULKEYTO WN (MAIN_PO)	16	8/25/2011	8/9/2011	Done	Done	10/3/2011	4:45 P.M.	8/26/2011
630-IL-ORIENT (MAIN_PO)	11	8/25/2011	8/9/2011	Done	Done	9/16/2011	4:30 P.M.	8/26/2011
630-MO-RENICK (MAIN_PO)	11	8/25/2011	8/9/2011	Done	Done	10/6/2011	1:30 P.M.	8/29/2011
630-MO-SANTA FE (MAIN_PO)	53	8/29/2011	8/9/2011	Done	Done	9/15/2011	4:30 P.M.	8/29/2011
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630-IL-VERNON (MAIN_PO)	11	8/19/2011	8/9/2011	Done	Done	9/9/2011	4:30 P.M.	10/1/2011
630-IL-YALE (MAIN_PO)	11	8/19/2011	8/9/2011	Done	Done	9/8/2011	4:15 P.M.	10/1/2011

GREAT LAKES	Level	Start Date	DM Study Approve	MPOO 1st Rev	DM Approve PROP	COMM Meet Date	Comm Meet Time	PROP Post Date
630-MO-ARMSTRONG (MAIN_PO)	13	8/16/2011	8/8/2011	Done	Done	9/29/2011	10:00 A.M.	10/4/2011
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1-2

Subject:

FW: Community Meetings

#7 No DMG room  
Kentucky

Community Meetings

The following meetings are scheduled:

Thursday Sept 15 Holland KY at 10:00 a.m.

Austin KY at 11:30

Wednesday Sept 21 Knob Lick KY at 1:30

#2 Slemp KY and Delphia KY BOTH scheduled at the same time and the same place on September 26 from 6 p.m. until 8 p.m.

There are several more and at least the two that are mentioned below.

Also the appointed "experts" Postmasters are the only ones scheduled to attend. The MPOO's are too busy. The communities deserve to speak with someone in authority.

We have advised the community contacts to ask for job titles of those conducting the meetings and to start the appeal process as soon as they stumble with the canned answers they give.

Mr. Reynolds agreed not to begin any future meetings until after 4:30 although he did not want to change the above scheduled ones.

hanks,  
  
Mark,

Would you like to take this on or would you like me to work my way up the ladder?

Thanks,  


22

near number of community meetings that must be hosted within a short period of time, JJ's, Roland and I are not able to host each one of the meetings. We have identified several coordinators to host the meetings and have provided training to them. See below list of Coordinators. The MPOO's are attempting to host all the meetings that they can, if they cannot attend their coordinator will host the meeting.

Furthermore, on occasion when the communities are close together we may choose to offer one meeting for 2 communities, such as I did last week at Williamsport and Boons Camp which were just a few miles apart- they share the same fire dept and we hosted the meeting at the fire dept, customers would preface their questions with the name of the office they were inquiring about. Which worked well, each community learned from the answers to the other communities' questions.

Kim Wolfe
Sandra Mosley
Angela Layne
Dana Fugate
Darla Baker
Doyle Keith
Sheila Tolson
Marsha Tidwell, PM Cumberland
Bob Turner, PM Hazard
Billy Jack Chadwell, PM Barbourville
Jeff Baker, PM Pineville
Sheri S. Sale
Ginner McClellan
Edwin Jesse
Harold Conley
Karen Wohlleb
Jeff McWilliams
Arnold White
Jennifer



Mark Strong

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From:  
Sent:  
To:  
Subject:

community meeting

#1 Time

More from OK....

"If you don't have time to do it right you must have time to do it over.."  
-- Anonymous

Subject: community meeting

The community meeting for the proposed closure of the Gate OK was held at 11:00 am. Some people in the community took off from their jobs to attend. Others could not do so. about 50 people were at the meeting.

The meeting for the May OK Post Office closure proposal was at 2:00 pm

IL/MO

Mark Strong

From:

Sent:

To:

Cc:

Subject:

Attachments:

Community Meetings 613 617.xls; community meetings 614 615.doc; Gateway Meeting Times.xls

Categories:

high priority

#1 NO POOM  
07 DM

Time

Mark, I attached the meeting schedules for 614 615 613 617 in Central IL and the Gateway Meeting times that were before 5. Look the following over and see if I included everything we talked about. Thanks for everything!  
Patti

#1 All of the 614 and 615 town hall meetings have been conducted by 4 different Postmasters from that POOM area with no MPOO present at any of them. Only one of these Postmasters would come to each meeting and would attempt to run the meeting while also making notes of questions they were asked and didn't know the answer to. All read from pre written speeches and then answered questions.

#1 IN 613 and 617 about 50% prior to 5 PM, starting at 4:30. To my knowledge neither in Central II DM or Gateway has a DM attended a meeting. 613/617 area town hall meetings, out of 36 meetings, MPOO attended 11 and the other 28 were given by the District Coordinator by herself. I don't believe that there were notes taken at any of these meetings.

#1 Central II District, Bureau, IL when a customer asked The POOM who was conducting the meeting if the questions and comments were part of the official record she said no. Of course we know it is based off part 25 and 26 of the 101.

#6 Finally in both Gateway and Central II Districts the 60 day proposals have errors with regard to miles between offices, savings based on the salaries, utilities etc that are in the analysis. Truly these numbers need to be looked at.

Mark Strong

From:  
ent:  
To:  
Cc:  
Subject:

Here's another example of a meeting in Arkansas without an MPOO in attendance...(and other issues...).

#1 notes  
no DM or MPOO

Last night at the Cale meeting, Chuck Hamilton was in charge. He introduced himself as the Postmaster in West Memphis. He was alone. He again said he needed no one taking notes, because as someone there (last night) knew from the Saratoga meeting he could remember EVERYTHING that was asked and said and repeat it verbatim when he was done. He said that he would be making notes last night, just as he had done for Saratoga, and giving them to the District Manager this morning.

During the meeting after a question about what would happen to the employees at Cale, he told the group that, "he first wanted to point out there was a difference in career employees and non-career employees. That the PMR would not have a job if the office closed but the Postmaster would be able to bid on offices that were being posted and there was a possibility of an early out for them."

He did NOT know the time line correctly nor did he give them the full process even when asked. He attempted it but was confused and not correct and told the community that he had not done this in a while and that he was not that up on it. He said he had look through the information some that day. He was asked a question about the costs savings for Cale and he started quoting numbers that were not correct and were WAY above the numbers in the proposal. The income, salaries and benefits and rent of the office he quoted were incorrect.

When asked how much the comments were really considered in the process he told them that he knew that Jackie took them very seriously. He said he knew that because he had been with her and opened the comments, gave them to her and she looked at them and categorized them. There was no mention of them going to Cary Chism at all or that any of them would be responded to. Note that Ozan has not had a response on any of comments or questions sent to individuals.

1-2

AR

**Mark Strong****Subject:**

FW: Postmaster duties and "Chain of Command"

#1 Date/Attitude

**Subject:** RE: Postmaster duties and "Chain of Command"


Trivial??? I'm sure you don't want anyone to believe that any of us would consider the scheduling of a community meeting "trivial."

If you read the complete string of email, you'll notice that we were instructed to notify Glenda Curtis is the date is not good. In my reply to the email, you'll notice that I did copy Glenda on the response. I also copied Bessie Fielder, the OIC in the office. You were copied because you are the Coordinator. I choose to copy Mr. Camp because I felt he should be aware that attempts are being made to schedule community meetings on inappropriate dates.

I received a reply from Candy Denny on Saturday stating the meeting date was either a "typo" or that she didn't realize it was the night before Thanksgiving. Candy seems to understand that the date needs to be changed and has asked that OIC send an email to either her or the MPOO. She said she would notify the OIC and MPOO of the new date.

  
  
**Subject:** RE: Postmaster duties and "Chain of Command"

I was just wondering why you would copy the DM about something so trivial as scheduling a community meeting? The directions below said to contact CANDY if the dates didn't work.



207  
As you can see from the screen shot below, I did follow proper procedures. When I realized I had left off Candy and Terrie, I immediately forwarded my email to them—less than one minute later. I did not fail to copy my immediate superior, then or now. Are you instructing me not to copy Mr. Camp on my email?

was not aware that I needed to include you on each and every email I send, nor was I aware that you are monitoring my email for "chain of command" compliance.

1-2

**Mark Strong****Subject:** FW: Goodwin Community MeetingSouth Dakota  
#1 Time of Day**Sent:** Tuesday, October 18, 2011 12:00 PM**Subject:** RE: Goodwin Community Meeting

My meeting at Corona was held at 10:00AM on Wed. Oct. 12, 2011. The Corona Town Clerk contacted the acting MPOO, several times to attempt to change the meeting to an evening time, as she told the MPOO that most of the people in the community work during the day time, and the farmers were busy with crop harvest...the Mayor, who teaches at Wilmot, could not even attend. The Postal Discontinuance manual, P.O.-101, states that the Town Hall meetings are to be conducted at a time and place convenient to the public, during nights and weekends, and that the community has a right to request or reschedule the meetings to be held at night. The MPOO, however, would not change the time, as requested by the Town Clerk.

Area meetings, held during the day, were as follows:

Oct. 6—Kranzburg 11:00AM  
           Goodwin 1:00PM  
           Reville 3:30PM

Oct. 12—Corona 10:00AM  
           Marvin 1:00PM

Oct. 13—Peever 10:00AM  
           Grenville 2:30PM

Oct. 18 Claire City 10:00AM  
           Lake City 1:00PM  
           Eden 3:00PM

In September, meetings were conducted during the day, as follows:

Sept. 29—Hazel 10:00AM  
           Henry 1:00PM  
           Raymond 4:00PM

Sept. 30 Wallace 1:00PM

In June, meetings were conducted, as follows:

June 1-- Bradley 6:00PM  
 June 2-- Garden City 9:30AM  
 June 6--Twin Brooks 10:30AM  
           Stockholm 1:30PM

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For your information, also, meetings were held in the Aberdeen area, mostly at night, as follows:

Oct. 4—Rockham 12:00PM  
Seneca 5:30PM

Oct. 5—Onaka 12:00PM  
Tolstoy 5:30PM

Oct. 6—Mansfield 2:00PM  
Cresbard 5:30PM

Oct. 12—Andover 5:30PM  
Pierpont 7:30PM

Oct. 13—Westport 5:30PM  
Barnard 7:30PM

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Mark Strong

Subject:  
Attachments:

#1 NO DM  
NO POOM  
NO notes  
Joint Mtg  
Times

Subject: RE: Testimony Info as requested

Here is the answer to question 3.

- #1 1. No DM in an attendance at any meeting in Indiana.
- #1 2. Newtown Indiana community meeting on Sept 22 at 3pm (on attached) was conducted by a gatekeeper, no POOM or DM, and no notes were taken.
3. Answered above,
- #1 4. Edwardsport and Westphalia joint community meeting, absolutely no notes taken, I witnessed it. There have been others that the League has attended that witnessed the same, but at this writing do not have that information yet. I will follow up today.
5. Edwardsport and Westphalia community meetings were back to back in Edwardsport at 10am and 11:30am on a Tuesday morning.

On the matter of the new questions. I do not have any exact wording, but in many locations the community members are led to believe there is no hope, but not that it was a done deal. And on irregularities, we have only found miles that separating the proposed office and admin office are not correct, in just about 100% of the locations. Will investigate further on the new questions as well today...get back the info to you.

Subject: Town Meetings

Here is what I have showing on the calendar for the POOM T Town Meetings:

Wednesday, September 28, 2011:



5:00 PM - Hillsdale. Hillsdale Fire Dept, 4051 Jefferson Lane, Hillsdale.

Thursday, October 6, 2011:

10:00 AM - Quincy. Quincy Baptist Church, 11190 Front St, Quincy.

1:30 PM - Coal City. Coal City Fire Dept, 4212 Main ST (Hwy 157), Coal City.

Friday, October 7, 2011:

1:00 PM - Newberry. Newberry Methodist Church, 575 Walnut St, Newberry.

Monday, October 24, 2011:

10:30 AM - Williams. Williams Community Building, 546 Hammersly Lane, Williams.

1:30 PM - Huron. Fire Barn, 61 Huron Railroad St, Huron.

Tuesday, October 25, 2011:

10:00 AM - Shepardsville. 10865 N Burton PL, Shepardsville.

Friday, November 4, 2011:

10:00 AM - Bowling Green. Bowling Green Community Center, 5230 E Washington St (1 block south of the PO).

1:00 PM - Cory. Cory Volunteer Fire Dept, 500 S Center St, Cory.



Terre Haute, IN

11-Oct			12-Oct			13-Oct			14-Oct		
OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME
Strawn	Liz	4:30	Anchor	Liz	4:30	Armington	Liz	4:30	Blackstone *	Liz	4:30
Sibley	Liz	6:00	Arrowsmith	Liz	6:00	Lawndale *	Liz	6:00	Dana	Liz	6:00
Cropsey	Liz	7:30	Cooksville	Liz	7:30	Shirley	Liz	7:30	Rutland	Liz	7:30
			Kenney	JB/Don	4:30						
			DeWitt	JB/Don	6:00						
			Bellflower	JB/Don	7:30						

17-Oct			18-Oct			19-Oct			20-Oct			21-Oct		
OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME
Mark	JB/Patti	4:30	Kasbeer	Liz	4:30	Dover	Liz	4:30	Leonore	Liz	4:30			
Bureau	JB/Patti	6:00	VanOrin	Liz	6:00	New Bedford	Liz	6:00	Long Point	Liz	6:00			
Cedar Point	Liz	4:30				Secor	JB	4:30						
Standard	Liz	6:00				Magnolia	JB	6:00						

			25-Oct			26-Oct			27-Oct			28-Oct		
OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME
			Mineral	Liz	4:30	Lee Center	Liz	4:30	Bartonville	Liz/JB/Monica	6:00			
						W. Brooklyn	Liz	6:00						
						Compton	Liz	7:30						

31-Oct			1-Nov			2-Nov			3-Nov			4-Nov		
OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME	OFFICE	COORD	TIME
Triumph	Liz	4:30	Arlington	Liz	4:30									
Troy Grove	Liz	6:00	Seatonville	Liz	6:30									

# 1 Times  
Central IL

In the attempt  
to rush them through  
note 1 person going  
three mtgs

Mark Stro

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From:  
Sent:  
To:  
Subject:

# 1 Times

Categories: high priority

Question 2 No Oct 5, 2011 3 pm Vinson Ok 73571

Question 3 Oct 5, 2011 3pm Vinson, Ok 73571 Debbie Noland was called ask by a customer to put the meeting at a later time to help school teachers and other employed customers and she refused.

Question 4 Oct 5, 2011 Vinson, Ok 73571

Robbie Steelman keep repeating that route service or cluster box would be available. You could call to get stamps or package picked up.  
Vinson Ok 73571 Oct 5, 2011 3pm

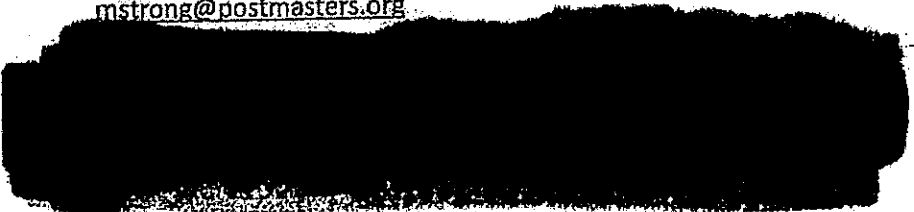
OK

**Mark Strong****Subject:**

FW: Fwd: Testimony

#1 Time

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
[mstrong@postmasters.org](mailto:mstrong@postmasters.org)



District manager was not at town meeting. Meeting was held at 4:00 pm for Pocasset, OK 73079 @ Pocasset community center on sept 21, 2011. Not sure if there are any issues with new question #2? However, our rural route was moved (DUO) before the meeting & the carriers raise has not been listed as an expense to the usps. Also, I understand that the count increased for him after the rural count. Jeanne, OIC Pocasset

Sent via BlackBerry by AT&T

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**Mark Strong**

Subject:

FW: Testimony

#1 Time of day  
#2 Comment

#6 Proposal

Subject: Re: Testimony

Mark: Good Evening!

1) None of the meetings in SD had a DM present.

#1 3) The following offices all had meetings scheduled during the day: Kranzburg, SD 10:00 AM Goodwin, SD 1:00 Revillo, SD 3:30 Corona, SD 3:00 Grenville, SD. These are only a few as I did not forward the message from my office to home with the rest of the towns. I did forward this to Dave Weber so you may already have that information. Basically any of the offices in Eastern SD had meetings held during the day by the acting MPOO.

#2 Goodwin, SD community felt the message presented was final -- no option, office would be close. At that point the meeting got rather "heated" and one of the community business people calmed everyone down and turned the meeting to more positive and refocused the energy to try to save the office.

#3 Belvidere, SD meeting held at 6:00 PM miles to nearest office wrong, village post office option the communities only option. MPOO started the meeting with a slide show on the "state of the Postal Service" that set the tone that IF the community would go with office closure it would help "save" the Postal Service -- basically do your civic duty.

Pringle, SD meeting held during the day (sorry do not know the time) Finance number incorrect on the Docite, number of miles to nearest city incorrect.

#4 Gann Valley, SD mileage incorrect to the nearest office (Docite states less than actual), zip code incorrect.

Best I can do for now!

**Mark Strong****Subject:**

FW: Meetings

#1 NO DM or P00M  
~~TIME OF DAY~~

#1 NO DM or P00M

**Subject:** Fwd: Meetings**Mark:**

Below is the email Kathy received the the Dakotas District Discontinuance Coordinator in Sioux Falls.  
Sally Tuomi is the MPOO East.  
Many meetings are being conducted by other Postmasters or OIC's.

Kevin Kleppelid/Postmaster at Baker, level 15  
Les Kassner/OIC at Glendive, level 20  
Randal Schwartz/PM at Havre, level 21  
Shantel Castellion, previously Big Sky District, a new PM at Sheppard, level 15. \*\*i think she's detailed back to the district  
Don Jensen, PM at Plentywood, level 18

this is what I have for meetings for Sally's offices (a schedule I received at the beginning of October that may have changed but I am unaware). I understand that Ken does his own meetings and he has several different notetakers. The list I have for his notetakers are SCF 594 – Darcy Hibbs from Cut Bank, 596 and 597 – Shirley Maier from Belgrade, and 598 and 599 – Shawna Gilroy from Polson.

Tuomi	ZIP	USPS Rep	Meeting Date	Time	Location
Alzada	59311	Kevin/Sally	31-Aug	6:00PM	Community Hall
Angela	59312		12-Oct	6:30PM	Rock Springs Hall (located 7 miles north of Angela on HWY 59N and then right 1/2 mile)
Antelope	59211	Ken/Sally	4-Oct	5:30PM	Community Center
Bearcreek	59007	Shantel	18-Oct	5:30PM	Bearcreek Town Hall

Biddle	59314	Kevin	20-Oct	5:30PM	Biddle Community Heritage Center
Bighorn	59010	Kevin	26-Oct	3:00PM-5:00PM	USPS rep at Big Horn PO (no public location for meeting)
Birney	59012	Shantel	26-Oct	4:15PM	Birney School
Bloomfield	59315	Les	28-Sep	6:30PM	Bloomfield School
Boyes	59316	Kevin	28-Sep	6:00PM	Boyes Community Hall
Brockway	59214	Les/Sally	8-Sep	7:00PM	Community Hall
Brusett	59318	Les	25-Oct	6:30PM	Fairview Community Hall (located across street from Brusett PO)
Cohagen	59322	Les	27-Oct	6:30PM	Cohagen Community Hall
Dagmar	59219	Don/Sally	5-Oct	5:30PM	Dagmar Central
Decker	59025	Shantel	27-Oct	3:30PM	Spring Creek School/Community Center
Flaxville	59222	Don	26-Oct	5:30PM	Lutheran Church, 108 1st Ave W
Garryowen	59031	Sally	19-Oct	2:30PM	the space adjacent to the Garryowen Post Office
Gracycliff	59033	Don/Shantel	13-Sep	6:30PM	Elementary School
Hammond	59332	Kevin	14-Sep	2:30PM	Boyes Community Hall on Hwy 212
Hingham	59528	Randal	5-Oct	6:30PM	Hi-Line Community Center
Hogeland	59529	Randal/Sally	28-Sep	6:30PM	Fire Hall
Ingomar	59039	Kevin	27-Oct	6:00PM	Tri-Rec Gymnasium
Inverness	59530	Randal	12-Oct	5:30PM	Inverness Sacred Heart Catholic Church
Joplin	59531	Randal	18-Oct	5:30PM	Joplin Community Hall
Kremlin	59532	Randal	4-Oct	6:30PM	Kremlin Lutheran Church
Lindsay	59339	Les	16-Sep	8:30AM	Lindsay Hall
Loring	59537	Randal	25-Oct	3:00PM	Loring Hall

Martinsdale	59053	Dan	4-Oct	5:30PM	Community Hall
McLeod	59052	Dan	22-Sep	6:30PM	McLeod School
Melville	59055	Dan/Shantel	14-Sep	7:00PM	Melville Luthern Church
Musselshell	59059	Shantel/Sally/Lisa	24-Aug	7:00PM	School
Otter	59062	Shantel	10/26 and 10/27	9AM-1:30PM (26th) and 9AM -1:30PM (27th)	USPS rep at Otter PO (no public location for meeting and PO lobby is only 4' x 9')
Outlook	59252	Dan	12-Oct	5:30PM	Outlook City Building
Peerless	59253	Dan	19-Oct	5:30PM	Lutheran Church
Pompeys Pillar	59064	Shantel/Sally	20-Oct	5:30PM	Fire Hall
Rapelje	59067	Shantel/Sally	12-Oct	6:00PM	Rapelje School
Raymond	59256	Dan	11-Oct	5:30PM	Raymond Community Center
Reserve	59258	Dan	18-Oct	5:30PM	Reserve Fire Hall
Rosebud	59347	Kevin	18-Oct	6:00PM	Rosebud School
Saint Xavier	59075	Sally	13-Oct	3:30PM	Pretty Eagle School
Sand Springs	59077	Lisa	18-Oct	6:30PM	Sand Springs Community Church
Sumatra	59083	Kevin	27-Oct	3:00PM	Tri-Rec Gymnasium
Two Dot	59085	Dan	5-Oct	5:30PM	Two Dot Community Club/Fire Hall
Vida	59274	Lisa/Sally	7-Sep	7:00PM	Vida School
Volborg	59351	Kevin	12-Oct	5:30PM	Volborg Post Office
Whitetail	59276	Dan	25-Oct	5:30PM	Fire Hall
Whitewater	59544	Randall	25-Oct	5:30PM	Whitewater School
Whitlash	59545	Randall	13-Oct	6:00PM	Whitlash Community Hall
Wyola	59089	Sally	18-Oct	3:30PM	Wyola School Gym/Cafeteria
Zortman	59546	Randall	27-Oct	5:30PM	Zortman Mining Office
Zurich	59547	Randall/Sally	29-Sep	6:30PM	Zurich Elementary School



**Mark Strong**

---

**Subject:**

FW: Meetings

# 1

ARKANSAS

**Subject:** RE: Meetings

Jackie said it at Fisher. Terrie Shepard said it at Datto. They both said, "This meeting will begin promptly at 5:30 and will end promptly at 6:30." Terrie added that an individual would be given 2 minutes in which to ask their questions or state their comments. She didn't hold anyone to the 2 minute limit...

It's my understanding that Jackie makes the 5:30 to 6:30 comment at every meeting she conducts. Terrie does the same... Not sure about the other MPOOs. I can check if you want...

**Subject:** Meetings

Here's what I've got so far... More to come I'm sure...

Saratoga, AR-- Meeting conducted by Chuck Hamilton, West Memphis AR Postmaster on detail as Attendance Control at the District. (He was the ONLY district staff in attendance)

Alleene, AR-- Meeting conducted by Jackie Stubitsch, District Discontinuance Coordinator. MPOO(A) Joe Henderson in attendance but with very little input.

Rosie, AR-- Meeting partially conducted by receiving Postmaster. MPOO was in attendance.

Fisher, AR-- Meeting conducted by Jackie Stubitsch. Terrie Shepard, MPOO(A) in attendance, but never said a word. She was learning, (from Jackie--of all people), how to conduct a meeting. Thank goodness she doesn't conduct them the way she saw Jackie do it!!!

I've only had 2 board members reply so far. I'll update you as more respond...

#2 Comments

Mark Strong

From:  
Sent:  
To:  
Subject:

Postal Meeting/Gravity, IA

# 2  
Comments

Mr. Strong

I am the Gravity community contact for the National League of Postmasters. I was able to attend a league meeting with our postmaster in Adair, Iowa, which was presented by [redacted]. He inspired me to fight to save our post office, which I'm doing. I have read your testimony to the PRC in which you mentioned Gravity and the limited Internet access and the elderly population. I'm in the process of doing an Internet usage survey.

Our community meeting with the postal officials was September 27. My "slogan" was "Pack the House" and the community did! And just like Barb had warned us, our community came out of that meeting with an "end is here" attitude & it's a "done deal". And here's why: After JaNan O'Brien, Manager Post Office Operations, did her introductions and a "briefing" on what's going on with the postal service, she stated "This is a feasibility study of discontinuance, but, face it folks, it's discontinuance". She was very rude, cutting people off, shutting them down. For instance, she interrupted our speaker and asked him if he wanted her job. When a military wife with 2 young girls was asking a question & was trying to tell her how she takes her girls to the post office to mail cards & packages to their dad in Iraq, she told her that if she would stop talking, she would answer her question. The military wife didn't get to finish. JaNan told her to use flat rate boxes. When a veteran was asking about his insulin that he gets by mail from the VA (which needs to be in a controlled environment), she told him to stay home to get his meds from the carrier. She also said that the VA mails out their meds the cheapest way they can, not 1st class. I've had 3 veterans tell me their meds from VA come 1st class. (I am definitely calling VA to let them know this). When asked what would happen to the postmaster, JaNan's response was that it was none of her business & she doesn't need to care what happens to her. This lady was a friend of the postmaster's. They have worked together orchestrating holiday parties for the kids in town & organizing funeral & Legion Auxiliary dinners. To quote our local newspaper, "Representatives from the Postal Service appeared to be almost hostile to the community during the question and answer time". **We video taped this meeting.** I am wondering if I can send a copy of this to you to view for an opinion. And if it will do any good, where else should I send it?

Needless to say, I'm going to have a hard time getting the community inspired to write letters now. They think it's a "done deal" and it won't do any good.

Mark Strong

From: [REDACTED]  
 Sent: [REDACTED]  
 To: Mark Strong  
 Subject: Testimony  
 Importance: High  
 Categories: high priority

#2  
#6Comments  
Proposal with errors

Mark

I know you want me to consolidate the responses I am receiving; however, this one has some excellent points and didn't know how to condense for you. Therefore, I'm sending the complete e-mail for your reference.

Vicki

# 1. If anyone had a DM at a community meeting, need place and date.

I went to three meetings -- Waterbury, Dixon and Belden. A DM was not at any of the three meetings.

2. Any meeting in your state that did not have a DM or POOM at the community meeting, need date and town.
3. Any meeting scheduled before 5 PM, I need date and location.
4. Any meeting that it was obvious that notes were not being taken, location and date.

It was difficult to tell if notes were being taken. *No one announced that this is a formal public meeting and that minutes and/or notes were being taken for the record.* I have never been at a formal public meeting where it was not announced that minutes would be taken and that comments made and questions asked would be added to the public record. This was the case in all three meetings that I attended: Waterbury, Dixon and Belden.

5. Any meeting that was combined with another town, in one location. Village A and Village B both being closed, meeting held in Village A.

## New Questions

1. Did any meeting have the speaker at the community meeting say that this was a done deal or lead everyone to believe that there was no hope. I need town, date and what was said.

#2 I was at the town meeting in Dixon on September 21, 2011. At that meeting, Dawn Bayer made several statements that concerned me and I found offensive. She said: That it is not a done deal, that this is a proposal. But, she said that she recommended everyone start using their 911 address in addition to their post office box on all correspondence. She said that the 911 address should go below the post office box, not above it. She said that addresses are read from right to left and top to bottom, so that way your address would be correct. She recommended changing all of your addresses now, getting your check blanks printed with your 911 address on them, etc. She said that "if you start

changing your addresses now... then when this goes through you are ready." (Note: this last sentence is a direct quote, as written in my minutes.)

She also told us that she personally uses the post office as little as possible. She does everything online or at stores so that she does not have to use the post office. I thought to myself, you are not a salesman for your business, are you?

**2. Has there been an irregularities to the 60 day notice to close, finances, mile to closes office, no official record with proposal. Again town and what the irregularities is.**

I am not sure what you are asking here, but offer the following:

1) The finances shown in the public notice posted and mailed out were a mess. For example, the Belden Public Notice that was posted in the Belden Post Office, issued on 9/9/2011 and signed by Dawn Bayer, showed the rent as \$503,214. Now, we know the rent is \$250/month or \$3,000/year. Obviously, this was a typo, but shows poor attention to detail. I am presuming that was supposed to be a total of some kind. But, the total savings shown was \$395,894. The document said that this was the total ten year savings. But, that number was not a total of the items listed and no explanation was given as to where that number came from. In addition, it showed utilities as \$0.00. We all know that there are some utilities to be paid to heat and light the building. So, all of the numbers provided were subject to question.

2) The same Proposal Posting for Belden dated 9/9/2011, says Under Effect on Employees: "The postmaster position is not vacant when the postmaster retired on January 1, 1990. Finally, there are 1 PMR(s) assigned to this unit. The PMR(s) may be separated from the Postal Service."

This statement makes no sense. The statement regarding a retirement of a post master makes no sense. First, we have a Post Master and it does not state the affect on her. Second, even though a PMR may be separated -- losing her job does have a negative impact on her. The proposal does not address the effect on employees at all.

3) the same Proposal Posting for Belden dated 9/9/2011, has two other errors. First, Under some advantages of the proposal are: It states: "4. CBU's can offer the security of individually locked mail compartments. . . ." At the public meeting they stated that we would not have the option of having CBU's, but that they had gone around town and identified several central locations where we could put up our own personal mail box. When we asked if we were going to have CBU's, we were told at the public meeting on September 28th, that we would not be given them as they were too expensive to install and maintain. We were told that we would have to put up our own mail boxes at the central location assigned by them. When asked why we could not put them at our own curb, we were told that was not allowed. Second, Under some advantages of the proposal are: It states: "5. Customers opting for carrier service will not have to pay post office box fees." Now, this again makes no sense. First of all we are not being given a choice to opt for carrier service. And we are not being given an option of residential (like in a city) delivery, but rural carrier service. We are being told that is what we are being given under the proposal. So, how can this be an advantage. Secondly, we don't pay post office box fees now. Our boxes are free. So, how can this be an advantage.

4) The same Proposal Posting for Belden dated 9/9/2011, under Section VII. Notices. States under item A. Support Materials. "Copies of all materials upon which this proposal.... are available for public inspection at the Belden Post Office and Laurel Post office during normal business hours."

The support materials were not available for inspection in Laurel, to the best of my knowledge.


Other comments that I have:

In the Dixon public meeting on September 21, Dawn stated that the 1970 Reorg Act stated that the Post Office "needed to show they made a profit." Then later in the meeting, she stated that "we don't make a profit — we flat line." So, which is it??

I just received three letters back -- form letters acknowledging my submission of a survey. I have two businesses as well as a personal survey that I submitted. In two of the three letters, the response says: "Since the suspension of service, there has been no indication that the business community has been adversely affected." The letter is sent to me in Belden, dated October 13, 2011. Now, how can they say that when the post office is still open and proposal period for hearing comments about the proposed closing does not end until November 9th.

In addition, in this same letter of response dated 10/13/2011, it states: "Mail will be forwarded in accordance with postal regulations. Change of address forms are available online at usps.com or from the postal service to assist customers in notifying correspondents of the change." This pretty much sounds like the decision has been made and I am being told to change my address now.

I hope that these comments help. By the way the Belden Docket # is 1354457-68717 if that helps. If you have any questions, or need to discuss any of the above, please feel free to email me or call me at 402-985-2113 or on my cell at 402-360-3020.



**Mark Strong**

**From:**  
**Sent:**  
**To:**

**Subject:**

**Categories:** high priority

#2 DONE DEAL  
#6 PROPOSAL

**From:** Mark Strong

**Sent:** Tuesday, October 18, 2011 8:28 PM

**To:** Frank J. Augustosky ; Gregory S. Acord ; John E Olson (E-mail) ; Kelly McCartney (E-mail) ; Mark Strong ; Nancy Trautman ; Norma J. Powell ; Shelly Souders (E-mail) ; Steve LeNoir

**Subject:** Testimony

League Leaders

I need to follow-up on a couple items. For those who have responded on the earlier emails on time of meeting, notes being taken etc do not respond again for those items just to new questions.

1. If anyone had a DM at a community meeting, need place and date.
2. Any meeting in your state that did not have a DM or POOM at the community meeting, need date and town. Barnes City, IA 6/23/11 7p.m. No DM or POOM present at meeting. Cindy Jensen, PM from Ankeny, has presided over other meetings; however, I do not have the names of these offices. She was there in place of the MPO. I have been trying to get the names of these towns, however I can not secure them at present. Ankeny (Johanna Hill who is also on my board) did state that Cindy told her that she had to go to a community meeting since Jean was unavailable to attend.
3. Any meeting scheduled before 5 PM, I need date and location.
4. Any meeting that it was obvious that notes were not being taken, location and date. Dawson, IA 9/21/11 6:15 p.m. No notes were taken at this meeting. Perry Postmaster even got up at the meeting and stated that this office is a "done deal" and all of Dawson's mail will now be coming out of Perry. POOM did not deny this and apparently now the Perry PM is getting disciplined for his comments at this meeting. The Dawson PM is sending me an email on this meeting tonight with more information.
5. Any meeting that was combined with another town, in one location. Village A and Village B both being closed, meeting held in Village A.

#### New Questions

1. Did any meeting have the speaker at the community meeting say that this was a done deal or lead everyone to believe that there was no hope. I need town, date and what was said. Dawson, IA 9/21/11

- #6
2. Has there been an irregularities to the 60 day notice to close, finances, mile to closes office, no official record with proposal. Again town and what the irregularities is. Bouton, IA: 60 day posting states that their mail will come from Perry once the office closes and at present it is coming out of Woodward, IA. Wiota, IA: 60 day posting states that their mail will come out of Atlantic once the office closes and at present it is coming out of Anita, IA. Brayton, IA: 60 day posting states that their mail will come out of Audubon once this office closes and at present it is coming out of Exira. Anita, Exira, & Woodward are not on a discontinuance list. All are Level 15/16 offices and these routes are head out from these offices.

I need this information by 8:00 EST Thursday. It is very important to our input and testimony with regard to the Advisory with the PRC so it needs to be accurate information.

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
[mstrong@postmasters.org](mailto:mstrong@postmasters.org)



### # 3 Goal is to Save Money



## FEDERAL REGISTER NOTICE – POST OFFICES

- The Postal Service has transmitted to the *Federal Register* a proposed rule entitled "Post Office Organization and Administration: Establishment, Classification, and Discontinuance" for public comment.
- The *Federal Register* notice was posted on the Federal Register's website for public inspection on Monday and is expected to be published in the Federal Register on Thursday, March 31.
- The proposed rules — if approved — would amend postal regulations to improve the administration of the post office closing and consolidation process.
- Comments will be accepted for 30 days from the date of publication.

The proposed rule changes include:

- **Top-Down Process:**  
Up to now, the Postal Service used a "bottom-up" process to identify post offices for possible discontinuance. Under the proposed rule, HQ management can identify candidate offices for study using a "top-down" approach initiated by HQ.
- **Factors to trigger a discontinuance study:**  
The proposed rule would clarify factors that could be used to identify candidate retail units for discontinuance study consistent with applicable law. The proposed factors would include: earned workload below the minimum established level for the lowest non-bargaining (EAS) employee grade, Insufficient customer demand would also be a factor that could lead to a feasibility study, as would the availability and accessibility of expanded access channels.
- **Process Management:**  
The proposed rule gives effect to improvements in the administration and management of the discontinuance process by removing steps such as waiting periods at the end of the discontinuance process, removing requirements applicable to hardcopy circulation of documents to facilitate automation, etc.
- **Stations and Branches Closings:**  
Up to now, the Postal Service has not subjected stations and branches to the same notice and comment periods as are applied to post office closings. Rather, the procedures for stations and branches are more abbreviated. The proposed rule would erase most of these differences and would apply the same notice and comment procedures to stations and branches as are applied to post offices.

- **Post Offices to Station and Branch Conversions:**

The conversion of a post office to a subordinate station or branch would no longer be subject to the notice and comment procedures applied to post office closings. The term "consolidation" would only apply when a Postal Service-operated retail facility is converted to a contractor-operated unit.

- **Postmaster to Post Office Ratios:**

The proposed rule would clarify that post offices may be managed by postmasters, as is commonly the case, or by other personnel acting under the supervision of a postmaster. Thus, a postmaster could serve in more than one post office, or an employee other than a postmaster could be responsible for day-to-day management of a post office.

## **BACKGROUND**

- In the past five years —
  - mail volume has declined by 43.1 billion pieces
  - customer visits have declined by 200 million
  - retail transactions have declined by \$2 billion.
- Reduced mail volume, coupled with the unique burden of prefunding retire health benefits, is creating enormous financial pressures on the Postal Service.
- These financial pressures have created a situation the Postal Service has not faced before — the need to adjust its entire infrastructure at every level.
- The Postal Service has an extensive retail network of nearly 32,000 post offices, stations and branches that has been left virtually untouched — until now.
- When studying the existing retail infrastructure, the Postal Service examines the effects of a proposed discontinuance on the community and postal employees, the ability to provide a maximum degree of effective and regular postal services to the affected community, and economic savings.
- There are currently more than 63,000 locations to purchase postage stamps — the top product sold at post offices.
- With the abundance of expanded access locations — in addition to *usps.com* and recent smart phone application launches — customers have never had greater access to postal products and services through multiple channels.
- The Postal Service receives no tax dollars for operating expenses, and relies on the sale of postage, products and services to fund its operations.

### # 3

#### Goal is to Save Money.

The following slides were part of a presentation to Congressional staff on April 21, 2011.

These slides illustrate that the motivating force behind this initiative, as the Postal Service was portraying it on the Hill was to save money.

They also illustrate how the Postal Service was suggesting that village Post Offices would Serve rural America better than current Post Offices.

The slides are also arguably deceptive since they implied that small rural postmasters make close to \$81,000 per year while in actuality they make much much less than half that. Indeed many of them makes less than \$40,000.

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# Briefing on Retail Discontinuance Policies and Management of Post Offices

April 21, 2011

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Cost Per Dollar

\$0.23<sup>1</sup>

Hours of  
operation

Mon-Fri  
9am – 5pm,  
limited weekends



## Traditional Post Office vs. Alternate Channels

Customers choose  
convenience and easy  
access

Traditional Retail Service  
Is the most costly channel  
of service

Customers are required to  
absorb the costs of  
political decisions that  
keep redundant post  
offices open

Customer choice will  
create the impetus to  
reconfigure retail network

Online

\$0.08-\$0.12

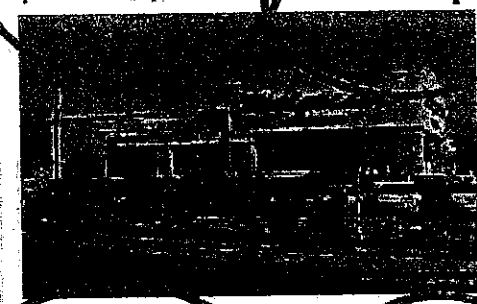
24/7



Partner

\$0.02-\$0.07

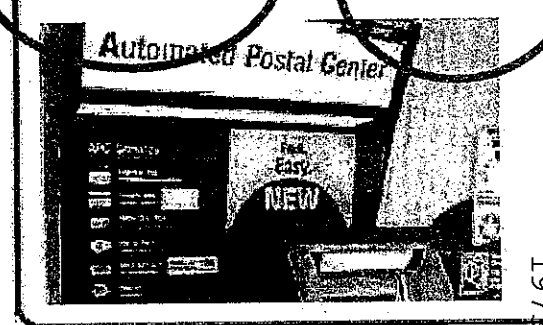
~7am-9pm



Self Service

\$0.12

24/7

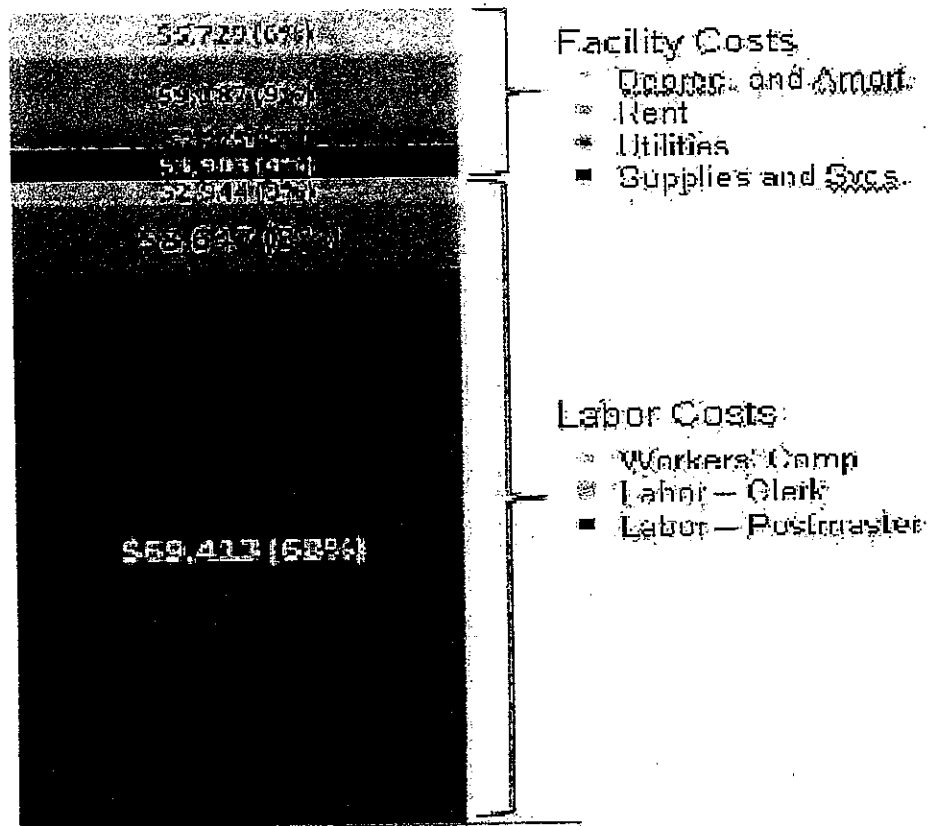


Perception	Reality
1. Small POs aren't big enough to warrant serious reform efforts	With \$1.25 billion in annual operating expenditures (excluding delivery costs), small POs have significant potential for cost savings
2. Alternate access is not available to rural customers	With average annual labor costs of \$81,000 (predominantly Postmaster Salary), cost avoidance strategies through alternate access is our strategic effort
3. Small POs are isolated, many miles from the next PO	Small POs tend to be clustered along major roads: 90% of small POs are within ten miles of another PO, and 48% are within 5 miles
4. Money orders are a major service provided by small POs	Though they may be time-consuming for Postmasters, money orders account for only 2% (\$780 annually) of the average small POs revenues
5. Customers at small POs tend to be senior citizens without mobility or internet	Median age in small PO zip codes (38 years) is virtually the same as in large PO zip codes (37 years); mobility and high speed access are not issues as once believed
6. Customers prefer the PO located in their zip code	Customer PO "selection" is based on many factors: proximity to work, commuting route, PO hours, perceived level of customer service, wait time

**Labor costs at small Post Offices comprise just under 80% of operating expenses\*, totaling greater than \$1 billion in FY2010.**

**Cost Analysis of Small Post Offices\***  
Average as a Percentage of Total, FY2010

Total: \$102,048



Small Post Offices

## Key Takeaways

1. Cost associated with Postmasters in small POs was \$972 million in FY2010
2. Facility-related costs represent only 21% of total operating expenses\*
3. Potential exists for significant cost savings from substitution of Alternate Access points.

\*Operating expenses exclude delivery-related costs.



#4 Loyalty Oath

DISTRICT MANAGER  
ARKANSAS DISTRICT



October 3, 2011

ALL DIRECT REPORTS  
POSTMASTERS  
STATION MANAGERS

As you are aware, in specific circumstances some of our Postal employees have actively become engaged in discontinuance study community meetings, to the detriment of USPS communications with actual customers. Some of our Postal employees have written congressmen and senators, beseeching their assistance in stopping discontinuance studies. Some have banded together with Postal retirees, in an effort to sidestep or stop processes geared toward bringing our organization back to financial stability. Some have provided outdated, erroneous or actual USPS handbook sections to local politicians, for their use in standing against possible post office closures. Some have instigated letter writing campaigns and may have misled community members on the costs, revenues and benefit of retaining their local Post Office.

This type of activity is restricted, and we must re-educate our employees of Postal regulations governing conduct.

**ELM 667.12 Engaging in Campaigns for Changes in Mail Service**

**Employees in active status must not engage in campaigns for or against changes in mail service. This regulation must not be construed to infringe on the rights to participate in labor organizations.**

Certainly, these are difficult times for any Postal employee. And it can be especially difficult for an employee in a smaller operation facing possible closure; an employee who has truly embedded themselves in the community they serve.

However, it is my expectation that all Postal employees be faithful to the United States Postal Service. There are specific instructions we must adhere to, as part of the HQ initiated discontinuance process, and no paid Postal employee should hinder these efforts in any way. This process is not optional, it is absolutely necessary as a part of building back financial stability for our Postal Service.

If you have any questions, please contact our District Human Resources Manager, Seritia Clark, at (501) 228-4240.

A handwritten signature in black ink that reads "David Camp".

David Camp  
District Manager

420 NATURAL RESOURCES DR  
LITTLE ROCK, AR 72205-9800  
501-228-4100  
FAX: 501-228-4105

#4 LOYALTY  
OATH  
198/2

DISTRICT MANAGER  
DALLAS CUSTOMER SERVICE AND SALES



July 27, 2011

ALL DISTRICT STAFF  
POSTMASTERS  
PLANT MANAGERS  
STATION/BRANCH MANAGERS  
DALLAS DISTRICT

SUBJECT: Media Response Policy

This memo will remind all employees of the policy for handling media inquiries, including newspapers, radio, television and social media such as Twitter and Facebook.

Refer all media requests for information and comment to McKinney Boyd, Southwest Area Corporate Communications Program Specialist for the Dallas District, at 214-819-8740, [mcKinney.boyd@usps.gov](mailto:mcKinney.boyd@usps.gov). In his absence, contact Earl Artis, Southwest Area Corporate Communications Manager at 214-819-8704, [earl.e.artis@usps.gov](mailto:earl.e.artis@usps.gov).

Under no circumstances should any postal employee conduct media interviews or provide information to the media about Postal Service matters without proper clearance and permission from Southwest Area Corporate Communications.

If you are contacted by any media about a local situation, gather the following information from the caller:

- The name of the media representative
- The name of the media organization
- A brief summary of the information requested.

Contact McKinney Boyd or Earl Artis by phone or via email with these details so that he can develop the appropriate response. Avoid the temptation to "answer a few questions" and provide Mr. Boyd with any information which may be helpful in responding to the inquiry.

Report immediately all issues with a potential for negative or controversial media coverage to Mr. Boyd. He will work with the appropriate functions to develop the response. The District Manager or his designee will review and approve that response before Mr. Boyd contacts the media.

Please make sure that all employees understand this policy. As more and more sensitive issues arise, following this policy is critical.

Victor H. Benavides

cc: District Manager  
cc: District Manager  
cc: District Manager  
cc: District Manager  
cc: District Manager

15

#4 County  
out h**Subject:** FW: ELM Regulations**Importance:** High

Postmasters,

I understand these are trying times, however please ensure the guidelines below are followed while your office is under study for PO Discontinuance or the AMP Study process. If you have any questions please let me know.

I committed to letting everyone know once HR has any info on what process will be followed if an office were to close. Unfortunately we still do not have any info, but once again, I promise I will let you all know as soon as I do. In the meantime, please continue to ask questions and if I don't know the answer I will try to find someone that does.

Thanks,

Sally

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**From:** DeMartino, Dominic - Big Dakota District, MT**Sent:** Monday, September 26, 2011 3:59 PM**To:** Bates Jr, Kenneth W - Belgrade, MT; Tuomi, Sally - Billings, MT; Carter, Steven E - Rapid City, SD; Cleveland, Wanda L - Bismarck, ND**Cc:** Cassaw, Benny E - Sioux Falls, SD; Roozenboom, Eunice M - Sioux Falls, SD**Subject:** FW: ELM Regulations**Importance:** High

Team,

Understand the changes taking place with the AMP and PO Closures Study; everyone needs to be aware of the guidelines below. This needs to be addressed AO's that have a scheduled Town Hall meeting.

Part of the job is to advise and please share with the PM's that the ELM is important to follow during this process. If you have question or concerns, feel free to contact me or Eunice.

**665.11 Loyalty**

Employees are expected to be loyal to the United States government and uphold the policies and regulations of the Postal Service.

**665.15 Obedience to Orders**

Employees must obey the instructions of their supervisors. If an employee has reason to question the propriety of a supervisor's order, the individual must nevertheless carry out the order and may immediately file a protest in writing to the official in charge of the installation or may appeal through official channels.

**665.16 Behavior and Personal Habits**

Employees are expected to conduct themselves during and outside of working hours in a manner that reflects favorably upon the Postal Service. Although it is not the policy of the Postal Service to interfere with the private lives of employees, it does require that postal employees be honest, reliable, trustworthy, courteous, and of good character and reputation. The Federal Standards of Ethical Conduct referenced in 662.1 also contain regulations governing the off-duty behavior of postal employees. Employees must not engage in criminal, dishonest, notoriously disgraceful, immoral, or other conduct prejudicial to the Postal Service. Conviction for a violation of any criminal statute may be grounds for disciplinary action against an employee, including removal of the employee, in addition to any other penalty imposed pursuant to statute. Employees are expected to maintain harmonious working relationships and not to do anything that would contribute to an unpleasant working environment.

**667.12 Engaging in Campaigns for Changes in Mail Service**

Employees in active status must not engage in campaigns for or against changes in mail service. This regulation must not be construed to infringe on the rights to participate in labor organizations.

**POSTMASTER OATH:** I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter.

*Eunice Roogenboom*

Operation Support Specialist  
Dakotas District  
PO Box 7520  
Sioux Falls SD 57117-7520  
605-333-7762

#5 Internet Survey

**Mark Strong**

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To: lindarvv@yahoo.com  
Subject: FW: Switchback

#5 Internet

Thanks

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
[mstrong@postmasters.org](mailto:mstrong@postmasters.org)



**Subject:** Switchback

The customer information from switchback vv was obtained by a person who has lived in the community most of her life. She knows e everyone in the community and has personal knowledge of their lifestyles and their lack of computer skills and accessibility. None of this information was obtained on postal property. The informal surveys were done, by phone, conversation on the street and door to door.

Sent via DroidX2 on Verizon Wireless™

**Mark Strong****Subject:** FW: Dewitt Survey**Importance:** High#5  
Internet**Importance:** High**Sent:** Wednesday, October 19, 2011 6:07 PM  
**Subject:** Dewitt Survey

Dewitt KY survey was determined by the personal knowledge of [REDACTED] who is a resident of the Dewitt community. The information was gathered off the clock. The community contacts have also gathered data concerning the possibility of alternate access and why this is not possible for the residents living in this area of Stinking Creek.

Due to the rural terrain of the area of Stinking Creek cell service is sporadic and internet is limited in the homes. The following data was pulled from a Google search of Dewitt KY which supports the internet survey results.

For residents 25 years and older in Dewitt:

37.4% have a H/S Diploma or higher (slightly more than one third have a high school education)  
3.9 % have a bachelors degree  
2.2 % graduate or professional degree

In 2009 Residents below Poverty Line was 54.6%.  
Residents at 50% below the above poverty line 15.1 %, the majority of residents in this community live below the state and national poverty line data.

Median income in Dewitt in 2009 was \$15,393, which in itself would support the economics of why residents do not have home computers nor internet access.


Dewitt Post Office was established in 1894 and is located on Stinking Creek in Knox County.  
It's on the direct line of travel for all of Stinking Creek. It's a very large rural area.

According to the locals and Pat Clouse at the Knox County 911 Office there are around 100 driving miles one way on Stinking Creek. The farthest point from the post office is about 35 to 40 driving minutes one way. There are about 730 deliveries in this area that includes PO Boxes and HCR routes.

Some areas are so remote they have no mail service. Most have rented a PO box at Dewitt due to the availability of receiving their mail and parcels from 7:00 a.m. until 7:00 p.m., seven days per week. Stinking Creek is a unique area as there is one way in through Dewitt and one way out. The major industry is logging



which means that customers must share the rural winding roads with semi trucks carrying logs which makes travel more challenging.



Mark Strong

To: Mark Strong  
Subject: RE: McHenry KY

Follow Up Flag: Follow up  
Flag Status: Flagged

Categories: high priority

*Internet Survey*

# 5

McHenry KY survey was determined by the knowledge of [REDACTED] and by the [REDACTED] through local knowledge of their community and customers. The survey was done off the clock.

Additional information was compiled by community contacts through conversations with the townspeople about alternate access. The weekly newspaper correspondent has written several articles about alternate access and customers are reporting on a daily basis that they have no means to secure alternate access due to no home computers nor do they foresee purchasing one.

This is the community that many elderly residents do not drive and would have to hire a driver to take them to the next town to access the post office. This would create an additional hardship as they already must hire someone to take them to the next town for groceries once per month. They pay their bills by money order (filled out by the PM) and receive their medication by mail in the PO where they walk to on a daily basis.

The meeting was cut short by the presenter and they did not fully answer all questions. These community members are writing the DM to try and get an answer. November 7 is the final day of the 60 day notice.

Subject: McHenry KY

Need the same info on this offices. Of the 84 customers only 29 have computers. How was that determined

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
[mstrong@postmasters.org](mailto:mstrong@postmasters.org)

# #6 Proposal Errors

24.1

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**Mark Strong**

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**Subject:**

**FW:**

As mentioned in my testimony although not wrong by the 101 this is just sending the wrong message that the decision to start the discontinuance is made so near or even before the community meeting.

**Subject: Re:**

Going into the final day of testimony in the AM. I will be going to the stand for one more time. One last chance for irregularities in the closing process.

How many had community meetings and 60 day proposals within the same 7 days?

**Information from CSDC site:**

**Meetings followed by the proposals:**

Basin - meeting 10/14, proposal 10/19  
 Coffee Creek - meeting 9/29 proposal 9/30  
 Dupuyer - meeting 9/30, proposal 9/30  
 Ethridge - meeting 9/27, proposal 9/30  
 Galata - meeting 9/28, proposal 9/30  
 Heart Butte - meeting 10/3, proposal 10/5  
 Highwood - meeting 10/12, proposal 10/19  
 Lindsay - meeting 9/16, proposal 9/22  
 Marysville meeting 10/14, proposal 10/19  
 McLeod - meeting 9/22, proposal 9/23  
 Monarch - meeting 10/11, proposal 10/18  
 Norris - meeting 9/21, proposal 9/28  
 Pony - meeting 9/21, proposal 9/28  
 Ringling - meeting 10/13, proposal 10/19  
 St. Xavier - meeting 10/13, proposal 10/13  
 Toston - meeting 10/17, proposal 10/19  
 Willow Creek - meeting 9/22, proposal 9/29

**There are also many that are receiving the proposals prior to the meeting date:**

Bighorn - meeting 10/16, proposal 10/14  
 Bloomfield - meeting 9/28, proposal 9/23  
 Boyes - meeting 9/28, proposal 9/27  
 Dagmar - meeting 10/5, proposal 9/28  
 Garryowen - meeting 10/19, proposal 10/14  
 Hingham - meeting 10/5, proposal 9/29  
 Hogeland - meeting 9/28, proposal 9/23  
 Kremlin - meeting 10/4, proposal 9/27  
 Martinsdale - meeting 10/4, proposal 9/27  
 Peerless - meeting 10/19, proposal 10/14  
 Sand Springs - meeting 10/18, proposal 10/14  
 Two Dot - meeting 10/5, proposal 9/29  
 Volborg - meeting 10/12, proposal 10/5

Wyola - meeting 10/18, proposal 10/13

Zurich - meeting 9/29, proposal 9/27

There are a few more getting proposals prior to the meeting, but with more than 7 days between.

Any one see a DM at the community meeting yet? not in Montana

Mark Strong

National League of Postmasters

Mark Strong

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From: [REDACTED]  
Sent: [REDACTED]  
To: [REDACTED]  
Subject: [REDACTED]

#6 Proposal

Categories: high priority

Listed below are two discrepancies noted in the Gann Valley SD 57341 post office closing docket.

Gann Valley SD 57341--Official docket says it is 15.8 miles from Kimball, when in reality mapquest says it is 21.5 miles between the two post offices.

Zip code listed on the front of the official blue record docket says Gann Valley SD 57371, instead of 57341.

Thank you for all your time and energy on this vast project.

[REDACTED]

**Mark Strong**

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**Subject:**

FW: Testimony

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
[mstrong@postmasters.org](mailto:mstrong@postmasters.org)

**Subject:** Re: Testimony

#2 NO notes  
#6 Proposal

Updated info....

4. Burkett community meeting on Sept 27, no notes taken. Keystone meeting on October 18 at 2pm, no notes taken

New question #2 on wrong information on proposals. Wrong mileage distances Tippecanoe to Argos, proposal shows 3.9, actual miles is 10, Bourbon proposal 3.9 from Burkett, actual mileage is 17, and Mentone another 3.9, actual is 8 from Burkett. Like I state earlier, in most all proposals in Indiana, mileage from closest office or admin offices have been way off.

**Subject:** FW: Testimony

All,

Please get this information to Mark ASAP and cc me as well. Thanks for all you do for the League. We've got to continue our struggle to keep small offices open.

Thanks again,

John Olson  
GLA Advisor

1-2

**Mark Strong**

Subject: FW: Testimony

Mark Strong  
 National League of Postmasters  
 5904 Richmond Highway, Suite 500  
 Alexandria, VA 22303-1864  
[mstrong@postmasters.org](mailto:mstrong@postmasters.org)

#6

60 Proposal with errors

Mark:

Mileage has been an issue in several offices. Melrose requested a correction to theirs, as they had originally listed alternate access at Butte as 20 miles, it is more like 35. Divide was also as an alternate access at 9 miles, but the HCR contract shows po to po as 10.4. The correction made it 9.96. But Divide is also under review, so is it going to be an alternate access?? Dillon is closer to Melrose, 31 miles, so why was that not listed as an alternate access. These issues were brought up at the Melrose meeting.

Pendroy MT - the proposal shows the 10 year savings for rent as \$262,853. The actual rent is \$260/month, which is \$3120/year, 10 year would be \$31,200. The total 10 savings is listed as \$273,750. But if the rent was corrected, that total would drop to \$42,107. Provided the rest of the figures are accurate.

Also see information below from Jamie Fry. I am forwarding another email with the Montana East meeting schedule, showing who is doing the meetings.

Subject: RE: Testimony

Otter, MT is a mess. They are redoing the cost assessment for a third time. The mileage is 31 to Ashland and they have it listed as less.

Rapelje they had originally sent the info with Columbus as the alternate facility, had the town meeting then on Tuesday the PM received a new docket that the alternate facility will now be Molt...so are they going to have another town meeting to let the people know what they changed for their alternate service if the PO gets closed?

Rosebud meeting was last night and it was a good one. Over 200 people showed up. My favorite statement was from a man who stood up and said he wanted his comment written into the official records that went to HQ....He said something like this....Rural America deserves equal treatment by the Postal Service. They are giving preferential treatment to Urban America. (I wrote it down but left my notes at work..darn it) The Postmaster from Baker was the speaker and he had very few answers and the crowd finally asked him if he was getting paid to be there. He said yes. They said it seemed to them to be a waste of the USPS' money to send someone to their town to hold a meeting and he couldn't even answer their questions! Kulr 8 news out of Billings was there and ran a story on tonight's 5pm news I guess.

I'm going to Pompeys Pillar tomorrow just to finally see if Sally, MPOO B, conducts the meetings in a different fashion



than the PM's that are usually the ones doing the meetings.

1-2

Mark Strong

From:

Sent:

To:

Subject:

Testimony

Categories:

high priority

#1

~~NO NOTES~~  
NO NOTES

#6 Error in 60 DAY

Mark

Another one that has some very interesting comments and points. I believe Kevin Allard is the Acting MPOO for the western part of Nebraska.

Vicki

1. If anyone had a DM at a community meeting, need place and date.
2. Any meeting in your state that did not have a DM or POOM at the community meeting, need date and town. Lisco's meeting was Tuesday, October 18. The leader of that meeting was Kevin Allard
3. Any meeting scheduled before 5 PM, I need date and location.
4. Any meeting that it was obvious that notes were not being taken, location and date. We didn't detect that any notes were taken at the Lisco, Nebraska, meeting on October 18, 2011. We did request written responses to our questions within 15 working days.
5. Any meeting that was combined with another town, in one location. Village A and Village B both being closed, meeting held in Village A.

#### New Questions

1. Did any meeting have the speaker at the community meeting say that this was a done deal or lead everyone to believe that there was no hope. I need town, date and what was said.
2. Has there been an irregularities to the 60 day notice to close, finances, mile to closes office, no official record with proposal. Again town and what the irregularities is. Our official letter to the Postal Patrons with the survey included was dated 9/20/11 and received by our patrons Friday, October 7. The due date for return of the surveys was October 10. Upon receiving the letter which allowed only 3 days to return (which included a weekend and a PO holiday) I called the number at the bottom of the letter (District Discontinuance Coordinator). That number was a "message only" so I left a message explaining the purpose of the call and that I needed an answer back immediately. I waited several hours and then called Rep. Adrian Smith's office. They called other PO officials and responded to me within 2 hours saying the "due date had been extended and the docket would be corrected". I then asked if a new letter would be sent to our patrons and the answer was "no." When this was addressed at our postal meeting on October 18 the response was "I knew it was an error but I had so much to do and had to get them out. I did the best I could." At the Official Meeting the Postal Officials indicated the survey deadline was now December 9 (the closing of the comment

2-2

period). The official docket states "On or about September 23, 2011, questionnaires were distributed to customers of the Lisco Post Office."

The line-by-line accounting of projected savings in the Official Docket were questionable.

	Existing	Proposed	1st Yr Svgs	10-Yr Svgs
Bldg. Maintenance	\$0	\$0	\$0	\$0
Utilities	\$2,203	\$0	\$2,203	\$0
Transportation	\$14,486	\$7,296	\$7,190	\$77,299
EAS Craft & labor	\$73,820	\$12,223	\$61,597	\$662,265
Contracts	\$153	\$0	\$153	\$1,645
Rent	\$33,909	\$0	\$33,909	\$0
1st Yr Savings			\$105,052	\$741,209
POD 10-yr NPV			\$583,132	
ROI			6893945%	

First Year Savings were skewed: the first year savings of \$33,909 for rent was the payout of the building lease, which is \$7200/yr. So a 1-year savings should just be the \$7,200. The savings for rent should have had the \$33,909 carried to the 10-year column. Same for the utilities—if you save them in year 1 they were also saved in the 10-year column. In all reality if an EAS is transferred to another PO that amount is not saved within the Postal System as a whole. It is just transferred to another PO. The only savings would be if the EAS left the Postal System.

In one place the \$583,132 is indicated as 10-year savings and another place is NPV (Net Present Value) which it not the equivalent of savings.

The ROI (Return on Investment) of 6893945% is an obvious miscalculation (even to an untrained eye). When that was questioned at our meeting, the answer was "it is a computer glitch and the official docket will be corrected." I attended another community's meeting two weeks ago and the same "glitch" was noted. To an agency trying to convince community members that the homework has been done and there is a definite savings in closing local post offices the above mistakes and answers are NOT convincing.

Mark Strong

From: [REDACTED]  
 Sent: [REDACTED]  
 To: [REDACTED]  
 Subject: Another Testimony  
 Categories: high priority

#6  
 Errors in 60 DAY NOTICE

> Mark--another one that has some interesting response for #2 new question.

2. **Has there been an irregularity in the proposal, finances, mile to closes office, no official record with proposal. Again town and what the Irregularities is.**

Information contained within the proposal to close the St. Helena Post Office did not look correct. This was brought up at our community meeting. The speaker recommended the incorrect data be pointed out to them so it could be corrected before the docket is finalized. Irregularities are noted below:

- The proposal states there has been a decline in the amount of walk in revenue generated over the past several years. The facts provided actually show an increase in revenue from 2007 to 2008, equal revenue from 2008 to 2009, then a decrease from 2009 to 2010.
- The proposal states the facility is leased through 9/30/2011 with a 30 day termination clause. While it is true the facility is leased, the amount of the lease (an inexpensive \$150/month, which includes all utilities except phone and internet service) is conveniently omitted. Also omitted is the fact that the lease has not changed in over 15 years.
- The retail service hours at the St. Helena Post Office are listed as one of the building deficiencies, yet the retail service hours at the Hartington Post Office (the Post Office listed to take over postal functions for the St. Helena Post Office) are actually less.
- The Hartington Post Office is listed as 12 miles away. It is actually 14 to 15 miles away.
- The St. Helena Post Office is listed as providing delivery and retail services 38 PO Boxes and no delivery route. The proposal omitted over 110 rural customers serviced by the St. Helena Post Office.
- The proposal indicates the postmaster position is not vacant when the postmaster retired on January 01, 1900. That date is over 100 years ago and is not relevant.
- The economic savings section does not add up to the 10 year savings amount. The one contributing line item is over \$180,000 more than the total.
- The economic savings section lists an EAS Craft and Labor 10 year savings of \$853,191, but does not provide any supporting details. How was this amount derived?
- The proposal states the office has experienced a decline in office workload but does not list any mail volumes to support the statement.
- The information in the Effect on Community section is not clear and worded poorly. It appears there are 96 Retirees in the community which is not correct. This section also omits the number of rural customers impacted by this proposed change.

1-2 #6

**Mark Strong****Subject:** FW: closing on appeal at 64434 (Docket No. A2012-5)

Note the proposal issues I have highlighted. Although under the old process still shows the failure of the Postal Service to follow their own rules.

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
mstrong@postmasters.org

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**Sent:** Saturday, October 15, 2011 5:15 PM  
**To:** Mark Strong  
**Subject:** closing on appeal at 64434 (Docket No. A2012-5)

Mark,

I am the OIC at Conception Junction, 64434, and also a member of the League. I have been receiving advice from different League reps; but have an unusual situation developing here at Conception Junction and would appreciate some input.

Our office started into the discontinuance process back in February, so we are under the old PO101. I have been following it along each step of the way as best I can, but as it has gotten down to the final stages, I am not real clear on the guidelines for the appeal process. I am also wondering if the discontinuance coordinator is very clear on the process either.

During the time of our proposal, they neglected to post the 'Invitation for Comments' next to the proposal. When I called their attention to it, they first told me it was on the last page of the proposal (it was not). When I told them that it had to be posted NEXT to the proposal, then they complied with the PO101.

During the posting of the final determination, they failed to provide the official record for customer viewing. I emailed to ask about it, and my email was never answered. After about 3 weeks, I emailed again, and then it was provided to me, via email for me to print off. However, as soon as I printed it off, I could tell that it was NOT the entire official record, as it was only about half as thick as the one that had been provided during the posting of the proposal. In addition, the pages that gave the summary of the questionnaires returned and the summary of the comments received during the proposal period were in such small print and so blurry, that they could not be read. There was also no table of contents.

The final determination was taken down on October 3, and on October 5, I saw on my home computer that the PRC had listed an appeal for 64434. However, on October 6, I received an email at work from the discontinuance coordinator instructing me to post the closing date in the lobby and to print off letters for the PO boxes informing them of the closing date of November 5. The letter also instructed them that they would need to contact the Stanberry Post Office for their proper street address and instructions on placement of their mailboxes for street delivery. It also informed them that if they did not have a box up by the time the office closed, that their mail would be held for 10 days at Stanberry Post Office, and then returned to sender.

I did as instructed, but later questioned (by email) what I should be telling the customers as some had come in to ask why their office was closing so soon, when just the week before they were all signing a petition to go along with the appeal to keep the office open. (Docket No. A2012-5) When she replied, she told me that she had checked for appeals before she sent the email, and that there were no appeals listed for 64434. Unfortunately, I did not inform her of the appeal for 64434 that I had seen on the PRC website the night before. (I don't think that she would've believed me.) Later in the day I received a phone call from the new discontinuance coordinator, telling me that in order for it to be considered an appeal, it must read: "I appeal...", which it did not.

2-2

There were several customers who that day (Friday) called the Stanberry Post Office, thinking that the post office would be closing on November 5, wanting to get set up for street delivery. Then we had the long weekend with Columbus Day holiday, and on Tuesday, I received an email telling me that on Wednesday, I would be receiving an Express Mail with the appeals documents to post in the lobby. There was no mention of informing the customers that the office would NOT close on November 5.

On Wednesday, October 12, I received the Express Mail, did as instructed, and then emailed her to let her know, and asked, "How will this effect our closing date?" When she replied that it would not close until after the appeals process was completed, I emailed back to ask for a letter informing the customers. There has been NO instructions regarding informing the customers that they were given the wrong information in the first letter. After sending an email each day asking for a letter to inform the customers, and receiving no reply, I finally composed a letter of my own on Friday to put into the PO boxes informing them that the office would NOT close on November 5.

Now, my question for you is: Should the PO box customers be switching over to street delivery at this time? Normally at what point are the PO box customers to be informed of the need for them to switch from the PO box service to street delivery?

At this point, I am concerned that if the PO box customers switch over to street delivery (due to the false information of a November 5 closure date), and we do not close, then they will have even more reason to close us.

I would appreciate any input that you have for me. Thank you.

**Mark Strong**

**From:** Barb Rasmussen [rass@iowatelecom.net]  
**Sent:** Wednesday, October 19, 2011 1:42 PM  
**To:** Frank J. Augustosky; Gregory S. Acord; John E Olson (E-mail); Kelly McCartney (E-mail); Mark Strong; Nancy Trautman; Norma J. Powell; Shelly Souders (E-mail); Steve LeNoir  
**Subject:** Re: Testimony  
**Categories:** high priority

# 6 = Proposal page 2

**From:** Mark Strong

**Sent:**

League Leaders

I need to follow-up on a couple items. For those who have responded on the earlier emails on time of meeting, notes being taken etc do not respond again for those items just to new questions.

1. If anyone had a DM at a community meeting, need place and date.
2. Any meeting in your state that did not have a DM or POOM at the community meeting, need date and town. Barnes City, IA 6/23/11 7p.m. No DM or POOM present at meeting. Cindy Jensen, PM from Ankeny, has presided over other meetings, however, I do not have the names of these offices. She was there in place of the MPOO Jean Susnjar. I have been trying to get the names of these towns, however I can not secure them at present. However, her supervisor in Ankeny (Johanna Hill who is also on my board) did state that Cindy told her numerous times that she had to go to a community meeting since Jean was unavailable to attend.
3. Any meeting scheduled before 5 PM, I need date and location.
4. Any meeting that it was obvious that notes were not being taken, location and date. Dawson, IA 9/21/11 6:15 p.m. No notes were taken at this meeting. Perry Postmaster even got up at the meeting and stated that this office is a "done deal" and all of Dawson's mail will now be coming out of Perry. POOM did not deny this and apparently now the Perry PM is getting disciplined for his comments at this meeting. The Dawson PM is sending me an email on this meeting tonight with more information.
5. Any meeting that was combined with another town, in one location. Village A and Village B both being closed, meeting held in Village A.

#### New Questions

1. Did any meeting have the speaker at the community meeting say that this was a done deal or lead everyone to believe that there was no hope. I need town, date and what was said. Dawson, IA 9/21/11

- #6
2. Has there been an irregularities to the 60 day notice to close, finances, mile to closes office, no official record with proposal. Again town and what the irregularities is. Bouton, IA: 60 day posting states that their mail will come from Perry once the office closes and at present it is coming out of Woodward, IA. Wiotia, IA: 60 day posting states that their mail will come out of Atlantic once the office closes and at present it is coming out of Anita, IA. Brayton, IA: 60 day posting states that their mail will come out of Audubon once this office closes and at present it is coming out of Exira. Anita, Exira, & Woodward are not on a discontinuance list. All are Level 15/16 offices and these routes are head out from these offices.

I need this information by 8:00 EST Thursday. It is very important to our input and testimony with regard to the Advisory with the PRC so it needs to be accurate information.

Mark Strong  
National League of Postmasters  
5904 Richmond Highway, Suite 500  
Alexandria, VA 22303-1864  
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#7 Formulas for 7/10s of One Percent

Email from Michael Ravnitzky to Bob Brinkmann, sent January 28 2011 8:36 am and received January 28 2011 98:41 am.

Bob:

I checked with the Commission's technical staff regarding your question.

The cost savings from closing CAG K&L post offices represents the savings of closing the rural offices and replacing the service with rural carriers. It also includes the revenue losses from CAG K&L post office boxes. So it is a net figure.

Below is the break-down of the different cost and revenue figures for FY 2009.

FY 2009 Cost Savings from Closing CAG K&L Offices

Annual cost for operating CAG K&L offices (\$Millions): 629.38

Cost of providing CAG K&L annual retail transactions by rural carriers: 22.99

Cost of providing CAG K&L annual post office box service by rural carriers: 40.81

Lost annual revenue from CAG K&L post office boxes: 29.68

Annual cost from replacing CAG K&L post office operations by rural carriers: 93.47

Annual savings from replacing CAG K&L post office operations by rural carriers: 535.91

source: Postal Regulatory Commission data

If you have additional questions, please let me know.

Michael Ravnitzky

-----Original Message-----  
From: robert.brinkmann [<mailto:robert.brinkmann@rjbrinkmann.com>]  
Sent: Fri 1/28/2011 3:21 PM  
To: RAVNITZKY, MICHAEL J  
Subject: Rural Post offices

Michael, we have said that rural post offices cost, roughly less than 7/10s of one percent of the Postal Service's money. That figure was updated using the data in your Universal Service Report. That figure comes from the costs of the lowest two levels of post offices. That is to say, if the smallest post offices, roughly 10,000 were closed, the Postal Service would save 7/10s of one percent of their gross budget.

But does the Commission know how much of that-roughly-includes delivery costs (both carrier and post office)? If it is a substantial part, then the "true" figure is much less than that.

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